FINAL

Environmental Impact Report

for the

Sterling Ranch Residential Project

SCH NO. 2019080092

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Appendices

1.0 INTRODUCTION

A. PURPOSE

As described in California Environmental Quality Act Guidelines (CEQA Guidelines) Section 15089, California Code of Regulations, title 14, Section 15089, a lead agency must prepare a Final Environmental Impact Report (Final EIR) before approving a project. This Final EIR for the Sterling Ranch Estates Residential Project (Project) has been prepared in accordance with CEQA Guidelines Section 15132, which lists the required contents for a Final EIR. As required by that section, this Final EIR consists of the following: the November 2021 Draft EIR for the Project; corrections, clarifications, and additions to the Draft EIR; copies of the comment letters received and a transcript of the oral testimony provided at the December 14, 2021 hearing conducted by a County of Los Angeles Hearing Examiner to accept comments on the Draft EIR; a list of persons, organizations, and public agencies commenting on the Draft EIR; responses to all comments received; a Mitigation Monitoring and Reporting Program (MMRP); and other information added for clarification by the lead agency, each described further below.

B. ENVIRONMENTAL REVIEW PROCESS

As defined in CEQA Guidelines Section 15050, the County of Los Angeles is the Lead Agency responsible for preparing the EIR for the Project. The County determined that preparation of an EIR was required for the Project after conducting preliminary review and preparing an Initial Study for the Project, dated August 5, 2019, in accordance with CEQA Guidelines Sections 15060 and 15063. In compliance with CEQA Guidelines Section 15082, a Notice of Preparation (NOP) was issued on August 5, 2019, to the State Clearinghouse, various public agencies, and other interested parties for the required 30-day review and comment period. Additionally, a virtual Scoping Meeting was held on December 14, 2021 to facilitate public review and comment on the Project. All NOP comments relating to the EIR were reviewed and the issues raised in those comments were considered in the preparation of the Draft EIR. The NOP, including the Initial Study, the NOP comments received by the County, and the Scoping Meeting comments, are contained in Appendix A of the Draft EIR. The Draft EIR was circulated for a 60-day public review period, which is 15 days longer than required by CEQA, from November 11, 2021, to January 10, 2022. During that review period, a virtual public hearing was held by a County of Los Angeles Hearing Examiner on December 14, 2021 to accept comments on the Draft EIR.

C. CONTENTS OF THE FINAL EIR

Section 1.0: Introduction. This section summarizes the Project under consideration and describes the contents of the Final EIR. This chapter also contains a list of all agencies or persons who submitted

comments on the Draft EIR during the public review period, presented in the following order: federal, State, and local agency; tribal entity; organization; individual; and date received.

Section 2.0: Corrections, Clarifications, and Additions to the Draft EIR. This section describes changes and refinements made to the Project since publication of the Draft EIR. These refinements, clarifications, amplifications, and corrections, which are described in the beginning of the section, would not change the environmental analysis and conclusions presented in the Draft EIR for the reasons discussed in this section. This section also summarizes text changes made to the Draft EIR in response to comments. Changes to the text of the Draft EIR are shown by either ~~strikethrough~~ where text has been deleted, or double underline where new text has been inserted.

Section 3.0: Responses to Written Comments. This section contains the comment letters received by Los Angeles County Department of Regional Planning (LACDRP) on the Draft EIR, followed by responses to individual comments. Each comment letter is numbered and identified for reference, and the individual comments in each letter are also identified by number. Each comment letter is followed by written responses to each of the comments in that letter.

Some comments that were submitted to LACDRP do not pertain to substantial environmental issues or do not address the adequacy of the analysis contained in the Draft EIR. Responses to such comments, though not required, are included to provide additional information. When a comment does not directly pertain to environmental issues analyzed in the Draft EIR, does not ask a question about the adequacy of the analysis contained in the Draft EIR, expresses an opinion related to the merits of the Project, or does not question an element of or conclusion of the Draft EIR, the response notes the comment and may provide additional information where appropriate. Many comments express opinions about the merits or specific aspects of the Project and these are included in the Final EIR for consideration by the decision-makers.

Section 4.0: Responses to Oral Testimony. This section presents a list of the persons who spoke regarding the Project and/or Draft EIR at the Hearing Examiner public hearing on December 14, 2021 and the issues raised in those comments. A copy of the hearing transcript is provided, followed by each individual comment and a corresponding response.

Section 5.0: Mitigation Monitoring and Reporting Program. This section contains the Mitigation Monitoring and Reporting Program (MMRP) required by Public Resources Code section 21081.6(a).

2.0 CORRECTIONS, CLARIFICATIONS, AND ADDITIONS TO THE DRAFT EIR

A. INTRODUCTION

This section of the Final EIR provides changes to the Draft EIR that have been made to clarify, correct, or add to the environmental impact analysis for the Sterling Ranch Estates Residential Project (Project). Such changes are a result of public and agency comments received in response to the Draft EIR and/or new information that has become available since publication of the Draft EIR. The changes described in this section do not result in any new or increased significant environmental impacts that would result from implementation of the Project. The changes to the Draft EIR are indicated below under the appropriate Draft EIR section heading. Deletions are shown with strikethrough and additions are shown with underline.

B. TEXT CHANGES TO THE DRAFT EIR

Provided below are corrections and additions to the Draft EIR including, where appropriate, the associated technical appendices. Changes are identified below by the corresponding Draft EIR section and subsection, if applicable, and the page number. Additions are double-underlined and deletions are shown in ~~strikethrough~~ format.

Section 3.0: Project Description

The following revisions have been made to Page 3.0-19 of the DEIR:

The Project's proposed drainage improvements are identified in **Figure 3.0-6**. The natural drainage patterns direct runoff in a southerly direction towards Hunstock Avenue. The proposed mass grading will result in the existing natural drainage pattern on the site being altered, impervious surfaces will be added from the proposed residential development and an urban storm drain system will be built that will replace the existing natural drainage pattern on the site. Runoff from surrounding natural areas, primarily located on the northern and eastern areas surrounding the VTTM site, would be collected in three debris basins, two debris/infiltration basins, and a single infiltration basin before entering the proposed storm drain system.

Additionally, all developed area drainage flows from all developed areas would be collected within the storm drain system, downstream of the drainage basin locations identified in **Figure 3.0-6**. A series of infiltration basins would be provided to reduce the peak flow and run-off volume for the VTTM site. Ultimately, the remaining stormwater would be conveyed within the system and would discharge to a percolation basin along Hunstock Avenue, where stormwater would be discharged to match existing drainage conditions.

The following addition has been made to Page 3.0-19 of the DEIR:

The water quality in the infiltration basin would be pretreated by continuous deflective separation (CDS) units. The County will be responsible for the maintenance of these CDS units with funding provided through a Drainage Benefit Assessment Area (DBAA) fee paid with property taxes. During development, the basins will be monitored in conjunction with the erosion control plans by a Qualified Stormwater Pollution Prevention Plan (SWPPP) Provider (QSP). Post development, the County will own the basins and monitoring will be provided by the County with funding provided by the DBAA.

As required by County code requirements, debris basins will be built as part of the new storm drain system. These basins will be monitored and maintained by the County of Los Angeles. Maintenance for the basins will be performed by the County including site inspections at regular intervals to determine when the capacity of drainage facilities has been reduced to the point that sediment removal is needed. As part of this maintenance, sediment will be removed from the basins as needed to meet County standards. Typically, these basins will not fill to the point that cleanout of sediment and debris is necessary unless the upstream tributary area burns. The County has regional sites where sediment from debris basins is deposited.

The following revisions have been made to Page 3.0-27 of the DEIR:

The VTTM site would have one mass grading plan and storm drain plan. The mass grading phase for the VTTM site and adjacent Off-Site Roadway Improvement Area would include excavation and lot grading and would occur in a single phase over approximately seven months. The VTTM site would require approximately 3,278,250 cubic yards of grading with approximately 3,056,100 cubic yards of that grading to be balanced on the VTTM site and Off-Site Roadway Improvement Area. Grading of the VTTM site and Off-Site Roadway Improvement Area would be balanced on-site and result in the cut/fill of approximately 1,610,000 cubic yards of soil. In addition, there would be approximately 1,446,100 cubic yards of removals and recompaction of unsuitable soil reused as certified fill. Organic materials would be exported from the Project site. Subsequent to the grading operations, graded slopes would be landscaped and irrigated pursuant to County grading and erosion control requirements. Upon completion of the grading operations, additional work would be needed for fine grading for the development pads and roadway infrastructure. Approximately 211,500 cubic yards would be used for lot and street over-excavation and approximately 11,000 cubic yards would occur to stabilize landslide areas.

Mass grading for the Project would be accomplished in a single grading operation in order to balance grading on the site, stabilize the remaining hillsides and fully develop the proposed drainage system. All graded slopes will be revegetated to minimize the potential for erosion.

While construction on individual homes and commercial uses would occur subsequent to grading and development of the proposed lots, phased grading is not feasible for the Project because grading would no longer be balanced and import and export would be required for each phase, which would result in additional construction impacts and result in a substantial increase in the cost of construction. Additionally, maintaining the current landforms is not feasible due to the existing geology and soils conditions on the site as addressed in the Project's geotechnical analysis report (refer to the Geotechnical Study in **Appendix F** of this Draft EIR).

Existing site conditions, including the amount of flatter areas, liquefaction hazards, etc., and federal, State, and local regulations which define the required vertical and horizontal standards for the realignment of Del Valle Road to meet sight distance criteria, ridgeline development restrictions, and fuel modification zones, are all factors that constrain the grading design of the Project. Development of the Project site would alter the existing surface water flow characteristics of the site and require modifications to meet pre-post hydrology requirements.

Liquefaction susceptibility is primarily associated with loose alluvial deposits that were identified within canyon drainages across the site, including most of the areas that have been delineated as "jurisdictional" non-wetland waters of the State. Remedial measures are required to reduce the hazard of liquefaction and associated liquefaction-induced ground failures to a level that conforms to the requirements of the California Building Code and Los Angeles County Department of Public Works Geotechnical and Materials Engineering Division. To mitigate seismic settlement potential, remedial measures include widespread removal of alluvial soils to depths up to 30 feet and replacement as a compacted fill. To mitigate potential lateral spread displacements, remedial measures include complete removal of alluvium down to bedrock at specific, critical locations across canyon drainages and replacement as compacted fill shear keys. The grading envelope required to achieve these necessary mitigations is extensive.

Since the susceptibility of the site to liquefaction is primarily associated with loose alluvial deposits identified within the canyon drainages across the Project site, grading of these areas is necessary to mitigate liquefaction hazards and the potential magnitude of associated liquefaction-induced ground failure, such as seismic settlement and lateral spread displacements.

A SWPPP would be prepared by a Qualified SWPPP Developer (QSD) and implemented for the duration of grading and construction as required by current regulations. The SWPPP will include Best Management Practices (BMPs) to mitigate potential erosion or water quality impacts, including hydroseeding, jute mesh, etc., as necessary to provide protection during the rainy season. The County will require bonds to ensure SWPPP implementation upon completion of mass grading to avoid the potential for an increase in erosion from graded areas that are not fully developed. Implementation of this SWPPP will avoid erosion on individual graded lots that have not yet been developed. Erosion control plans would be reviewed and approved by the County prior to each rainy season.

Section 4.0: Environmental Setting

The following revision has been made to Page 4.0-19, Paragraph 3, of the DEIR:

The Sanitation Districts of Los Angeles County (LACSDs) provide wastewater and solid waste management services to a service area of ~~820~~ 850 square miles. Additionally, LACSDs own, operate, and maintain over 1,400 miles of main trunk sewers and eleven wastewater treatment plants, with a total permitted capacity of 652 million gallons per day (MGD). The LACSDs are comprised of ~~twenty-three~~ twenty-four sanitation districts working cooperatively under a Joint Administration Agreement (JAA). The sanitation district that serves the Santa Clarita Valley area is the Santa Clarita Valley Sanitation District (SCVSD).[1] The SCVSD owns and operates two Water Reclamation Plants (WRPs) within the SCVSD service area: the Saugus WRP and the Valencia WRP.

The following revision has been made to Page 4.0-19, Paragraph 4, of the DEIR:

The current combined capacity of the SCVSD system is 28.1 MGD (31,470 AFY), of which 21.6 MGD (24,190 AFY) can be treated at Valencia WRP and 6.5 MGD (7,280 AFY) at Saugus WRP. The current capacity is sufficient to treat influent flows for the foreseeable future ~~until approximately 2036, at which time planned expansion at the Valencia WRP would bring the total system treatment capacity to 34.1 MGD (38,190 AFY)~~.[2] No expansion is planned at the Saugus WRP. In 2015, the combined treatment of the Valencia WRP and the Saugus WRP was approximately 18.4 MGD.

1 Sanitation Districts of Los Angeles County (LACSD), *Chloride Compliance Facilities Plan EIR*, accessed April 2020, https://ceqanet.opr.ca.gov/Project/2012011010.

2 Santa Clarita Valley Water Agency, *2015 Urban Water Management Plan for Santa Clarita Valley*, accessed April 2020, https://yourscvwater.com/wp-content/uploads/2018/01/2015-FINAL-Urban-Water-Management-Plan-for-Santa-Clarita-Valley_16JUN2017-1.pdf.

Section 5.3: Biological Resources

The following addition has been made to Page 5.3-62 of the DEIR:

(f) Los Angeles Regional Water Quality Control Board

Pursuant to provisions of the Porter-Cologne Water Quality Act, the Regional Water Quality Control Board (RWQCB) regulates discharging waste, or proposing to discharge waste, within any region that could affect water of the State (California Water Code Section 13260[a]). The Los Angeles Water Board's Basin Plan is aimed at protecting the overall ecosystem associated with a stream, including the associated riparian habitat, and impacts to biological resources within riparian and wetland habitat are within the jurisdiction of the Los Angeles Water Board.

The following addition has been made to Page 5.3-81 of the DEIR:

The Project would result in permanent, direct impacts to 105.7 acres of suitable habitat for American badger, San Diego black-tailed jackrabbit, and San Diego desert woodrat. While American badger and San Diego black-tailed jackrabbit adults are highly mobile and can usually escape human disturbances, young dependent on the nest would be highly vulnerable to injury and mortality during construction. San Diego desert woodrats are reliant on their middens. Based on the analysis, the Project has the potential to cause significant direct impacts to San Diego black-tailed jackrabbit, American badger, and San Diego desert woodrat. However, the Project would implement **MM 5.3-2** (Worker Education and Awareness Program), **MM 5.3-3** (Construction Fencing), and **MM 5.3-7** (Biological Monitoring), as described above. **MM 5.3-26** (Sensitive Species Protection Plan) would require preparation of a Sensitive Species Protection Plan by a qualified biologist prior to issuance of grading permits and at least thirty (30) days prior to the start of vegetation removal or grading activities. Additionally, recommended mitigation **MM 5.3-11** through **MM 5.3-13** would be implemented during Project construction activities, including: conducting (1) pre-construction surveys for San Diego black-tailed jackrabbit; (2) pre-construction surveys for American Badger; and (3) pre-construction surveys for San Diego desert woodrat. Finally, implementation of **MM 5.3-1** would preserve approximately 37.9 acres, in perpetuity, of potential habitat for wildlife species. Thus, impacts would be less than significant with mitigation.

The following addition has been made to Page 5.3-82 of the DEIR:

Mountain lions are large predatory mammals that prefer areas with dense undergrowth and cover in deserts, humid coast forests, arid hillsides, and scrub and oak woodlands. Species-specific surveys and wildlife camera surveys were not conducted; however, there is high potential to move through the Project site based on

presence of suitable habitat and presence of their primary prey item, the mule deer. Mule deer (*Odocoileus hemionus*) was occasionally observed foraging and moving through the Project site, specifically within the VTTM site on three occasions (5/20/2020, 6/22/2020, and 6/22/2020). However, mountain lions or their sign (i.e., scat and/or tracks) were not observed on the Project site during 2016, 2017, 2018 or 2020 surveys conducted by biologists which consisted of over 248 person hours. **MM 5.3-25** will be implemented to avoid any potential impacts to mountain lions. Due to temporary presence of mountain lions, their mobile nature, and abundant suitable habitat present in the Los Angeles County Santa Clara River SEA and Santa Felicia SEA, the South Coast Missing Linkages Sierra Madre – Castaic Connection and Santa Monica – Sierra Madre Connection, and the California Essential Habitat Connectivity Project Essential Connectivity Areas to the northwest, west, and southwest of the Project site, direct impacts to mountain lions and suitable habitat would be less than significant.

The following addition has been made to Page 5.3-86 of the DEIR:

The Project has been designed and would be implemented to meet applicable federal, State, and County hydrology and water quality standards, which will result in the mitigation of impacts to water quality to a less-than-significant level. Because the design of the Project meets these existing regulatory requirements, which have been developed to avoid water quality impacts, no additional mitigation is necessary to mitigate the potential impacts of the Project on water quality.

The following revision and addition has been made to Page 5.3-87 of the DEIR:

Common, not sensitive, vegetation communities provide suitable habitat for special-status wildlife species that have potential to occur within the Project site. Potential impacts to special-status wildlife species are addressed by species with appropriate mitigation and the loss of suitable habitat would not result in significant impacts to these wildlife species. The establishment of the Off-Site Open Space Dedication Area, as indicated in MM 5.3-1 (Conservation Easement), preserves adjacent natural habitats which can be utilized by special-status wildlife species. Additionally, implementation of recommended MM 5.3-14 (Homeowner Association Covenants, Conditions & Restrictions), MM 5.3-15 (Trash Receptacles), ~~and~~ MM 5.3-16 (Lighting), **MM 5.3-23** (Pet Signage), and **MM 5.3-24** (Wildlife Signage) would reduce impacts to special-status wildlife species.

The following addition has been made to Page 5.3-92 of the DEIR:

Maintaining the current landforms and accommodating the proposed development is not feasible due to restrictions on the modifications of ridgelines and the existing geology and soils conditions on the site as addressed in the Project's geotechnical analysis report (refer to the Geotechnical Study in **Appendix F** of

this Draft EIR). Mass grading for the Project would be accomplished in a single grading operation in order to balance grading on the site, stabilize the remaining hillsides, and fully develop the proposed drainage system. All graded slopes will be revegetated to minimize the potential for erosion.

While construction on individual homes and the commercial uses would occur subsequent to grading and development of the proposed lots, phased grading is not feasible for the Project because grading would no longer be balanced and import and export would be required for each phase, which would result in additional construction impacts and result in a substantial increase in the cost of construction.

A SWPPP would be prepared by a Qualified SWPPP Developer (QSD) and implemented for the duration of grading and construction as require by current regulations. The SWPPP will include Best Management Practices (BMPs) to mitigate potential erosion or water quality impacts, including hydroseeding, jute mesh, etc., as necessary to provide protection during the rainy season. The County will require bonds to ensure SWPPP implementation upon completion of mass grading to avoid the potential for an increase in erosion from graded areas that are not fully developed. Implementation of this SWPPP will avoid erosion on individual graded lots that have not yet been developed. Erosion control plans would be reviewed and approved by the County prior to each rainy season.

Existing site conditions, including the amount of flatter areas, liquefaction hazards, etc., and federal, State, and local regulations, which define the required vertical and horizontal standards for the realignment of Del Valle Road to meet sight distance criteria, ridgeline development restrictions, and fuel modification zones, are all factors that constrain the grading design of the Project. Development of the Project site would alter the existing surface water flow characteristics of the site and require modifications to meet pre-post hydrology requirements.

Liquefaction susceptibility is primarily associated with loose alluvial deposits that were identified within canyon drainages across the site, including most of the areas that have been delineated as “jurisdictional” non-wetland waters of the State. Remedial measures are required to reduce the hazard of liquefaction and associated liquefaction-induced ground failures to a level that conforms to the requirements of the California Building Code and Los Angeles County Department of Public Works Geotechnical and Materials Engineering Division. To mitigate seismic settlement potential, remedial measures include widespread removal of alluvial soils to depths up to 30 feet and replacement as a compacted fill. To mitigate potential lateral spread displacements, remedial measures include complete removal of alluvium down to bedrock at specific, critical locations across canyon drainages and replacement as compacted fill shear keys. The grading envelope required to achieve these necessary mitigations is extensive.

Since the susceptibility of the site to liquefaction is primarily associated with loose alluvial deposits identified within the canyon drainages across the Project site, grading of these areas is necessary to mitigate liquefaction hazards and the potential magnitude of associated liquefaction-induced ground failure, such as seismic settlement and lateral spread displacements.

The following addition has been made to Page 5.3-97 of the DEIR:

As previously discussed, approximately 0.13 acres of non-wetland waters of the US subject to potential regulation by the USACE, approximately 1.17 acres of streambed, and associated riparian vegetation and swale subject to regulation by the California Department of Fish and Wildlife (CDFW), are located within the VTTM site. The streambed features potentially subject to the jurisdiction of the RWQCB have limited shrub/tree vegetative cover and limited value as movement corridors for large wildlife species. For this reason, small mammals, such as foxes and bobcats, and birds could use these areas for movement.

The following additions have been made to Page 5.3-97 of the DEIR:

Excavation and grading activities associated with the new water tank would require the removal of approximately 0.41 acres of the total 1.32-acre woodland canopy and understory habitat associated with OW2, allowing for approximately 69.3 percent of the total canopy area associated with OW2 to be retained. Pursuant to the County Oak Woodlands Plan, these activities within the intact woodland would have an impact severity ranking of high based on the assumption that the impact would result in the net loss of oak woodland acreage and the loss of habitat and understory. Accordingly, the Project's construction activities would result in potentially significant impact to OW2. Implementation of recommended **MM 5.3-20** would ensure purchase of mitigation credits for 1.22 acres of oak woodlands from an off-site oak woodland habitat preservation area owned by a third party, or an in-lieu fee shall be paid to the County's Oak Forests Special Fund. Implementation of recommended **MM 5.3-27** would require a pre-construction tree pest and disease survey prior to tree removal to evaluate trees for infectious tree diseases. With implementation of **MM 5.3-20** and **MM 5.3-27**, the Project's potential construction related impacts to OW2 would be less than significant.

The following addition has been made to Page 5.3-100 of the DEIR:

A total of 0.61 acres of oak woodland canopy within OW2 and OW3 would be potentially impacted during Project construction. Implementation of recommended **MM 5.3-20** and **MM 5.3-27** would ensure that the Project's impacts on OW2 and OW3 would be less than significant.

The following addition has been made to Page 5.3-100 of the DEIR:

Development within the VTTM site and Off-Site Roadway Improvement Area would potentially impact two protected oak trees including two removals. Additionally, a total of two protected oak trees would not be disturbed by active construction-related activities or grading; therefore, these trees would be preserved in place. Pursuant to the County Oak Tree Ordinance, the Project would be required to either replace the removed trees per County standards or pay in-lieu fees at the appraised cost for all proposed protected tree removals. Therefore, the Project would implement recommended **MM 5.3-21** (Oak Plantings in VTTM site Fuel Modification Zone C) and **MM 5.3-22** (Tree Protection Measures) to ensure that potential impacts to protected oak trees would be less than significant. Additionally, the Project would implement recommended **MM 5.3-27** (Pre-construction Tree Pest and Disease Survey) prior to tree removal to evaluate impacted oak trees for infectious tree diseases, and if trees are impacted by infectious pests or diseases, prepare an Infectious Tree Disease Management Plan or develop a detailed, robust, enforceable, and feasible list of preventative measures to avoid the spread of infectious tree pests and diseases. Refer to Appendix B and Appendix C of **Appendix C** of this Draft EIR for the VTTM site and Off-Site Roadway Improvement Area Oak Tree Report and the Off-Site Water Tank Area Oak Tree Report, respectively.

The following addition has been made to Page 5.3-101 of the DEIR:

Development within the Off-Site Water Tank Area would potentially impact 23 protected oak trees including 12 removals and 11 encroachments. Pursuant to the County Oak Tree Ordinance, the Project would be required to either replace the removed trees per County standards by planting 24 oak trees or pay in-lieu fees at the appraised cost for all proposed protected tree removals. The Project would implement recommended **MM 5.3-20** (Off-Site Water Tank Area Oak Woodland and Oak Tree Mitigation). Additionally, the Project would implement recommended **MM 5.3-27** (Pre-construction Tree Pest and Disease Survey) prior to tree removal to evaluate impacted oak trees for infectious tree diseases, and if trees are impacted by infectious pests or diseases, prepare an Infectious Tree Disease Management Plan or develop a detailed, robust, enforceable, and feasible list of preventative measures to avoid the spread of infectious tree pests and diseases. Compliance with the County Oak Tree Ordinance and implementation of mitigation would reduce construction impacts to protected oak trees to less than significant.

The following revision and addition have been made to Page 5.3-103 of the DEIR:

As discussed previously, three special-status plant species would be directly impacted by the Project including the Slender mariposa lily, Pierson's morning-glory, and Southern California black walnut.

Moreover, special-status wildlife species that would be directly impacted by the Project include the California legless lizard, Blainville's horned lizard, San Diegan whiptail lizard, loggerhead shrike, southern California rufous-crowned sparrow, nesting birds, American badger, San Diego black-tailed jackrabbit, and San Diego desert woodrat. As such, the Project would implement **MM 5.3-1** through **MM 5.3-5**, **MM 5.3-8** through **MM 5.3-17**, **MM 5.3-18**, ~~and~~ **MM 5.3-19**, **MM 5.3-25,** and **MM 5.3-26**, which would minimize impacts to special-status species to a less than significant level. Based on protocol surveys conducted in the study area, the Project is not expected to result in direct or indirect impacts to any State- or federally listed wildlife species. Focused surveys for the coastal California gnatcatcher were conducted according to species-specific protocols, and none of these sensitive wildlife species were observed in the study area. Because the Project would not have a significant impact on special-status species, the Project would not contribute in a cumulatively considerable way to any potentially significant cumulative impact on a local or regional scale and impacts would be less than significant.

Mitigation Measure MM 5.3-1 on Page 5.3-105 is revised as follows:

MM 5.3-1 **Conservation Easement**. […] The Slender Mariposa Lily Mitigation and Monitoring Plan (SMLMMP) shall include annual pre-construction surveys of the Project impact areas, Open Space Dedication Area conservation easement, and open space areas within the VTTM site to map and flag slender mariposa lily individuals recording the location and quantities of slender mariposa lily for seed collection (Project impact area, Open Space Dedication Area conservation easement, and open space areas within the VTTM site) and translocation (from the Project impact area to the Open Space Dedication Area conservation easement) […]

[…] During pre-construction surveys, slender mariposa lily individual locations will be marked with a high-accuracy GPS unit and a permanent marker established in the field to locate the individuals for bulb collection. Bulbs shall remain in the ground until project development. Prior to Project development, the bulbs and adjacent topsoil (including associated microorganisms and mycorrhizal fungi) shall be translocated within appropriate habitat in the Off-Site Open Space Dedication Area conservation easement as directed by the SMLMMP […]

The above mitigation measure is also added to Section 1.0: Executive Summary, Table 1.0-1: Summary of Project Impacts, of the Draft EIR.

Mitigation Measure MM 5.3-1 on Page 5.3-107 is revised as follows:

MM 5.3-1 **Conservation Easement**. […] The SMLMMP shall include annual pre-construction surveys of the Project impact areas, Open Space Dedication Area conservation easement, and open space areas within the VTTM site to map and flag slender mariposa lily individuals recording the location and quantities of slender mariposa lily for seed collection (Project impact areas, Open Space Dedication Area conservation easement, and open space areas within the VTTM site) and translocation (from the Project impact areas to the Open Space Dedication Area conservation easement). […]

The above mitigation measure is also added to Section 1.0: Executive Summary, Table 1.0-1: Summary of Project Impacts, of the Draft EIR.

Mitigation Measure MM 5.3-1 on Page 5.3-108 is revised as follows:

MM 5.3-1 **Conservation Easement**. Monitoring shall take place annually and in perpetuity from the time of establishment of the conservation easement. If it appears that the population of any special-status plant species or the vegetation community composition and status are on the decline or have been degraded, remedial activities, shall be implemented according to the CMP and the SMLMMP. These activities may include weed control, additional seeding, native plant establishment, or other activities where appropriate. If slender mariposa lily seeding and translocation at the Off-Site Open Space Dedication Area conservation easement results in failure of progressing towards a self-sustaining population, understanding that populations vary greatly annually due to environmental conditions, achieving the 5:1 (mitigation plantings: impacted individuals) mitigation ratio for planted mariposa lilies. However, growth and development of SML can vary greatly with seasonal (i.e., winter/spring) environmental conditions. Therefore, the need for remedial action will be assessed in consideration of growth and development of the mitigation population relative to nearby reference populations, and remedial actions will be triggered when the mitigation population is observed to trend negatively in direct comparison to other SML reference populations. To supplement the shortfalls of slender mariposa lily mitigation at the Off-Site Open Space Dedication Area conservation easement, a contingency measure including additional off-site, in-kind preservation of slender mariposa lilies within the County shall be implemented at 10:1 (mitigation plantings : impacted individuals) to cumulatively achieve the 5:1 mitigation ratio. […]

The above mitigation measure is also added to Section 1.0: Executive Summary, Table 1.0-1: Summary of Project Impacts, of the Draft EIR.

Mitigation Measure MM 5.3-1 on Page 5.3-109 is revised as follows:

MM 5.3-1 **Conservation Easement**. […] During pre-construction surveys, slender mariposa lily individual locations will be marked with a high-accuracy GPS unit and a permanent marker established in the field to locate the individuals for bulb collection. Bulbs shall remain in the ground until project development. Prior to Project development, the bulbs and adjacent topsoil (including associated microorganisms and mycorrhizal fungi) shall be translocated within appropriate habitat in the Off-Site Open Space Dedication Area conservation easement as directed by the SMLMMP. […]

The above mitigation measure is also added to Section 1.0: Executive Summary, Table 1.0-1: Summary of Project Impacts, of the Draft EIR.

Mitigation Measure MM 5.3-9 on Page 5.3-112 is revised as follows:

MM 5.3-9 **Pre-construction Nesting Bird Survey.** Prior to the issuance of grading permits, the Project Developer shall submit the qualifications of the biologists to the County of Los Angeles Department of Regional Planning (LACDRP) for review and approval. Within thirty days of ground-disturbing activities associated with construction or grading for the Project that would occur during the nesting/breeding season of native bird species potentially nesting on the site (typically February 15 but as early as January 1 for some raptors through ~~August 31~~ September 15 in the Project region, or as determined by a County-approved biologist), suitable habitat shall be surveyed within seven days prior to initiation of disturbance work by a County-approved biologist to determine if active nests (actively breeding or nesting) of bird species protected by the Migratory Bird Treaty Act and/or the CFGC are present in the disturbance zone or within 300 feet (500 feet for raptors) of the disturbance zone. If initiation of ground-disturbing activities is delayed, then additional pre-disturbance surveys shall be conducted such that no more than seven days will have elapsed between the survey and ground-disturbing activities. […]

The above mitigation measure is also added to Section 1.0: Executive Summary, Table 1.0-1: Summary of Project Impacts, of the Draft EIR.

Mitigation Measure MM 5.3-14 on Page 5.3-116 is revised as follows:

MM 5.3-14 **Homeowner Association Covenants, Conditions & Restrictions.** Prior to the issuance of grading permits, the Project Developer shall submit the homeowner association (HOA) Covenants, Conditions & Restrictions to the County of Los Angeles Department of Regional Planning for review and approval. The homeowner association Covenants, Conditions & Restrictions shall include the following requirements to reduce potential human impacts on adjacent habitats and wildlife species:

- All dogs and cats shall be in compliance with requirements found in Sections 10.20.150 through 10.20.350 of the Los Angeles County Code related to appropriate licensing and tagging, leashed animals when appropriate, ensuring that all dogs and cats are neutered or spayed (or an unaltered license in accordance with Los Angeles County Code), and that all dogs and cats have a microchip.
- Smoking shall be prohibited in open space areas.
- Speed limits shall be posted, and the Covenants, Conditions & Restrictions shall require residents to comply with the posted speed limits.
- Balloons shall not be utilized by the homeowner association for any community events and the use of balloons by individual homeowners shall be discouraged.
- Homeowner reprisals against native wildlife species (i.e., killing or harming native wildlife species in any way) if homeowner pets are killed or harmed by wildlife shall be prohibited.
- Second-generation anticoagulant rodenticide use shall be prohibited.

The above mitigation measure is also added to Section 1.0: Executive Summary, Table 1.0-1: Summary of Project Impacts, of the Draft EIR.

Mitigation Measure MM 5.3-17 on Page 5.3-116 is revised as follows:

MM 5.3-17 **Palmer's Goldenbush Scrub Mitigation**

Prior to the issuance of grading permits, to offset the Project's 6.7 acres of direct impacts to Palmer's goldenbush scrub, compensatory mitigation is required. Subject to County of Los Angeles Department of Regional Planning approval, there shall be a no net loss of Palmer's goldenbush scrub (1:1) ~~and total mitigation acreages shall be at a minimum of 3:1 (mitigation: impact acres)~~ shall include one of the following measures (note that #1 below is the preferred mitigation option. #2, #3, #4, or #5 will be implemented if #1 is not feasible):

1. **On-site in-kind preservation (0.2:1), on-site out-of-kind preservation (5:1), and off-site in-kind creation/enhancement (1:1)**: In addition to the on-site preservation of

the existing 1.4 acres of Palmer's goldenbush scrub and on-site habitat preservation of the existing 31.9 acres of native scrub (not including Palmer's goldenbush scrub) through establishment of a conservation easement of the Off-Site Open Space Dedication Area through **MM 5.3-1 Conservation Easement**, the Project Developer shall implement the following ~~**On-site in-kind creation (1:1) and in-kind and out-of-kind preservation (0.2:1 and 5:1) (Total > 5.2:1)**~~:

- Off-site in-kind creation/enhancement of Palmer's goldenbush scrub at a property with suitable Palmer's goldenbush scrub habitat, such as the Land Veritas Curtis Property. A conservation easement will be recorded over the property and a total of 6.7 acres of Palmer's goldenbush scrub shall be created/enhanced. As part of the recording of the conservation easement, a Conservation Management Plan (CMP) shall be prepared that specifically identifies the required resource management activities and the entities that shall be responsible for managing those activities in perpetuity. The CMP shall identify Palmer's goldenbush scrub creation/enhancement methods, maintenance frequency, monitoring methods and frequency, success criteria, and reporting requirements ~~Creation of 6.7 acres of Palmer's goldenbush in open space areas within the VMMT site (1:1)~~.

- ~~Establishment of a conservation easement where 31.9 acres of native scrub (a minimum of (0.2:1 in-kind and up to 5:1 out-of-kind) will be preserved in perpetuity.~~

Alternative Palmer's Goldenbush Scrub Mitigation if Preferred Palmer's Goldenbush Scrub Mitigation #1 is not feasible.

2. **On-site in-kind preservation (0.2:1), on-site out-of-kind preservation (5:1), and off-site out-of-kind preservation (5:1)**: In addition to the on-site preservation of the existing 1.4 acres of Palmer's goldenbush scrub and on-site habitat preservation of the existing 31.9 acres of native scrub (not including Palmer's goldenbush scrub) through establishment of a conservation easement of the Off-Site Open Space Dedication Area through **MM 5.3-1 Conservation Easement**, the Project Developer shall implement the following:

   - Purchase out-of-kind native scrub mitigation credits at an off-site mitigation bank, such as the Land Veritas Petersen Ranch, for the preservation of 33.5 acres of out-of-kind native scrub habitat, effectively mitigating for impacts to 6.7 acres of Palmer's goldenbush scrub through off-site out-of-kind preservation of native scrub at 5:1. Or, establishment of a deed restriction at an off-site property in Los Angeles County for the preservation of 33.5 acres of out-of-kind native scrub habitat, effectively mitigating for impacts to 6.7 acres of Palmer's goldenbush scrub through off-site out-of-kind preservation of native scrub at 5:1.

3. On-site in-kind creation (1:1) and in-kind and out-of-kind preservation (0.2:1 and 5:1) (Total > 5.2:1): In addition to the on-site habitat preservation of existing 1.4 acres of Palmer's goldenbush scrub within the Off-Site Open Space Dedication Area conservation easement, the Project Developer shall implement the following:

- Creation of 6.7 acres of Palmer's goldenbush in the open space areas within the VTTM site (1:1).
- Establishment of a conservation easement where 31.9 acres of native scrub (a minimum of 0.2:1 in-kind and up to 5:1 out-of-kind) will be preserved in perpetuity.

4. On-site in-kind creation/enhancement and/or preservation (1:1) and in-kind and out-of-kind preservation (0.2:1 and 5:1) (Total > 5.2:1): In addition to the on-site habitat preservation of existing 1.4 acres of Palmer's goldenbush scrub, the Project Developer will commit to the following:

- Creation/enhancement of Palmer's goldenbush within portions of the proposed Off-Site Open Space Dedication Area conservation easement and/or open space areas within the VTTM site and/or preservation of existing native scrub alliance(s) with Palmer's goldenbush scrub association within portions of the proposed Off-Site Open Space Dedication Area conservation easement to total 6.7 acres (1:1).
- Establishment of a conservation easement where 31.9 acres of native scrub (a minimum of 0.2:1 in-kind and up to 5:1 out-of-kind*) will be preserved in perpetuity. *The acreage of Palmer's goldenbush scrub association(s) would count towards in-kind preservation.

5. **On-site in-kind creation/enhancement and/or preservation (1:1) and in-kind and out-of-kind preservation (0.2:1 and 5:1), plus off-site in-kind creation/enhancement:** In addition to the on-site habitat preservation of existing 1.4 acres of Palmer's goldenbush scrub, the Project Developer will commit to the following:

- Creation/enhancement of Palmer's goldenbush within portions of the proposed Off-Site Open Space Dedication Area conservation easement and/or open space areas within the VTTM site and/or preservation of existing native scrub alliance(s) with Palmer's goldenbush scrub association within portions of the proposed Off-Site Open Space Dedication Area conservation easement to total 6.7 acres (1:1).
- Establishment of a conservation easement where 31.9 acres of native scrub (a minimum of 0.2:1 in-kind and up to 5:1 out-of-kind*) will be preserved in perpetuity. *The acreage of Palmer's goldenbush scrub association(s) would count towards in-kind preservation.

- If on-site in-kind creation/enhancement and/or preservation and in-kind and out-of-kind preservation do not achieve a total of 3:1, off-site in-kind habitat creation/enhancement will be incorporated to achieve at total of 3:1. Off-site in-kind creation/enhancement of Palmer's goldenbush scrub at a mitigation bank, such as Land Veritas Curtis Property, Los Angeles County, Upper Santa Clara River Mitigation Site, will be established with an acreage appropriate to achieve a total of 3:1 mitigation.

The above mitigation measure is also added to Section 1.0: Executive Summary, Table 1.0-1: Summary of Project Impacts, of the Draft EIR.

Mitigation Measure MM 5.3-21 on Page 5.3-119 is revised as follows:

MM 5.3-21: **Oak Plantings in VTTM site Fuel Modification Zone C.** A total of 12 coast live oak (*Quercus agrifolia*) trees shall be planted, maintained, monitored, and reported on within the VTTM site. The 12 coast live oak trees shall be locally sourced (from nursery stock grown from locally sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they were planted) 1-gallon oak trees planted on preferably north-facing slopes within the northwest corner of the VTTM site in Fuel Modification Zone C on non-graded slopes within natural open space, avoiding native habitat disturbance. The planted trees shall be subject to a 7-year monitoring period by an independent third-party certified arborist. This monitoring effort shall consider growth, health, and condition of the subject trees to evaluate success. The monitoring efforts shall result in recommendations of remedial actions should any of the tree plantings exhibit poor or declining health.

The above mitigation measure is also added to Section 1.0: Executive Summary, Table 1.0-1: Summary of Project Impacts, of the Draft EIR.

The following addition has been made to Page 5.3-124 of the DEIR:

MM 5.3-23 **Pet Signage.** Prior to Project completion, the Project Applicant shall install signage requiring pets be kept on leash and on trails at all times. Signage shall also include information signage for hikers encouraging clean-up after pets and discourage animal waste.

The above mitigation measure is also added to Section 1.0: Executive Summary, Table 1.0-1: Summary of Project Impacts, of the Draft EIR.

The following addition has been made to Page 5.3-124 of the DEIR:

MM 5.3-24 **Wildlife Signage.** Prior to Project completion, the Project Applicant shall install appropriate public information signage in the residential area and along the trail to 1) educate and inform the public about wildlife, especially mountain lions, present in the area; 2) advise on proper avoidance measures to reduce human-wildlife conflicts; 3) advise on proper use of open space trails in a manner respectful to wildlife; and 4) provide local contact information to report injured or dead wildlife. Signage shall be written in the language(s) understandable to all those likely to recreate and use the trails. Signage shall not be made of materials harmful to wildlife such as spikes or glass. In addition, the Project Applicant shall prepare a long-term maintenance plan to repair and replace the signs.

The above mitigation measure is also added to Section 1.0: Executive Summary, Table 1.0-1: Summary of Project Impacts, of the Draft EIR.

The following addition has been made to Page 5.3-124 of the DEIR:

MM 5.3-25 **Mountain Lion Avoidance.** Within one year prior to Project implementation, including site preparation, equipment staging, and mobilization, strategically placed, non-invasive remote wildlife cameras shall be deployed within the VTTM Site to detect the presence/absence of mountain lions. A report documenting the results of the camera survey, including negative findings, shall be submitted to the County and CDFW prior to initiation of Project activities. The survey report shall include measures to avoid impacts to mountain lions that may be in the area, as well as to dens and cubs, if needed, depending on the results of the camera survey. If a pregnant or lactating (i.e., engorged teats) female mountain lion's images were recorded regularly by a wildlife camera, a 2,000-foot buffer would be applied from the location of the camera station, which would be assumed to be near the natal den.

The above mitigation measure is also added to Section 1.0: Executive Summary, Table 1.0-1: Summary of Project Impacts, of the Draft EIR.

The following addition has been made to Page 5.3-124 of the DEIR:

MM 5.3-26 **Sensitive Species Protection Plan.** Prior to issuance of grading permits and at least thirty (30) days prior to the start of vegetation removal or grading activities, a qualified biologist shall prepare a Sensitive Species Protection Plan (SSPP) for species identified in the DEIR

as being potentially present on the Project Site, including, but not limited to, San Diego desert woodrat, San Diegan whiptail, sharp-shinned hawk, oak titmouse, Costa's hummingbird, and Vaux swift. This plan shall be provided to CDFW for their review and comment and shall be approved by LACDRP prior to the issuance of grading permits. For any measures involving proposed species relocations, the SSPP shall identify handling and relocation protocols and a minimum of two relocation sites with suitable, species-specific habitat within 0.25 miles away from the Project site, including a map of suitable relocation locations. The SSPP shall include avoidance and minimization measures as well as mitigation measures to off-site impacts to a specific species and/or its habitat. Written approval from CDFW shall be obtained when the SSPP is finalized. The SSPP shall be amended for any new species observed within or adjacent to the Project area or that CDFW determines may be impacted by Project activities. Species included in the SSPP shall include, but not be limited to, San Diego desert woodrat, San Diegan whiptail, sharp-shinned hawk, oak titmouse, Costa's hummingbird, and Vaux swift.

The above mitigation measure is also added to Section 1.0: Executive Summary, Table 1.0-1: Summary of Project Impacts, of the Draft EIR.

The following addition has been made to Page 5.3-124 of the DEIR:

MM 5.3-27 Pre-construction Tree Pest and Disease Survey.

1) Prior to tree removal, a certified arborist should evaluate trees for infectious tree diseases including, but not limited to, sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2021; UCANR 2021; Phytosphere Research 2012; UCIPM 2013).

2) If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist should prepare an Infectious Tree Disease Management Plan or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list should provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported from the Project Site without first being treated using best available management practices described in the Infectious Tree Disease Management Plan or list of preventative measures.

3) If possible, all tree material, especially infected tree material, should be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.

The above mitigation measure is also added to Section 1.0: Executive Summary, Table 1.0-1: Summary of Project Impacts, of the Draft EIR.

The following addition has been made to Page 5.3-124 of the DEIR:

MM 5.3-28: **Mountain Lion Movement.** Prior to issuance of a grading permit, to mitigate the contribution of the Project to a regional cumulative impact on mountain lion movement: (1) the subdivider shall establish a Conservation Easement over the 37.9-acre Off-Site Open Space Dedication Area and a Conservation Plan prepared and implemented to preserve coastal scrub habitat in the Off-Site Open Space Dedication Area and a 0.36-acre public trail as illustrated on Vesting Tentative Tract Map No. 60257 shall be maintained in perpetuity to maintain movement opportunities for mountain lions between Chiquita Canyon and the Los Padres National Forest (please refer to MM 5.3-1); and (2) subdivider shall purchase an off-site conservation easement, to be held by a public agency or non-profit conservation planning organization, (a) covering at least 50 acres of equivalent habitat or (b) a smaller area if the following can be demonstrated: (i) within a known mountain lion corridor, or (ii) containing a riparian habitat and adjacent to a known mountain lion corridor, or (iii) within a known or modeled mountain lion movement corridor located in western Los Angeles County or eastern Ventura County, north of State Route-126 and south of the Los Padres National Forest. The conservation easement shall be recorded prior to grading permit issuance. The final size and location of the conservation easement shall be to the satisfaction of the director.

The above mitigation measure is also added to Section 1.0: Executive Summary, Table 1.0-1: Summary of Project Impacts, of the Draft EIR.

Section 5.6: Geology and Soils

The following addition has been made to Page 5.6-16 of the DEIR:

Maintaining the current landforms and accommodating the proposed residential development is not feasible due to restrictions on the modifications of ridgelines and the existing geology and soils conditions on the site as addressed in the Project's geotechnical analysis report (refer to the Geotechnical Study in **Appendix F** of this Draft EIR). Mass grading for the Project would be accomplished in a single grading operation in order to balance grading on the site, stabilize the remaining hillsides, and fully develop the proposed drainage system. All graded slopes will be revegetated to minimize the potential for erosion.

While construction on individual homes and commercial uses would occur subsequent to grading and development of the proposed lots, phased grading is not feasible for the Project because grading would no longer be balanced and import and export would be required for each phase, which would result in additional construction impacts and result in a substantial increase in the cost of construction.

A SWPPP would be prepared by a Qualified SWPPP Developer (QSD) and implemented for the duration of grading and construction as required by current regulations. The SWPPP will include Best Management Practices (BMPs) to mitigate potential erosion or water quality impacts, including hydroseeding, jute mesh, etc., as necessary to provide protection during the rainy season. The County will require bonds to ensure SWPPP implementation upon completion of mass grading to avoid the potential for an increase in erosion from graded areas that are not fully developed. Implementation of this SWPPP will avoid erosion on individual graded lots that have not yet been developed. Erosion control plans would be reviewed and approved by the County prior to each rainy season.

The following addition has been made to Page 5.6-16 of the DEIR:

Existing site conditions, including the amount of flatter areas, liquefaction hazards, etc., and federal, State, and local regulations, which define the required vertical and horizontal standards for the realignment of Del Valle Road to meet sight distance criteria, ridgeline development restrictions, and fuel modification zones, are all factors that constrain the grading design of the Project. Development of the Project site would alter the existing surface water flow characteristics of the site and require modifications to meet pre-post hydrology requirements.

Liquefaction susceptibility is primarily associated with loose alluvial deposits that were identified within canyon drainages across the site, including most of the areas that have been delineated as "jurisdictional" non-wetland waters of the State. Remedial measures are required to reduce the hazard of liquefaction

and associated liquefaction-induced ground failures to a level that conforms to the requirements of the California Building Code and Los Angeles County Department of Public Works Geotechnical and Materials Engineering Division. To mitigate seismic settlement potential, remedial measures include widespread removal of alluvial soils to depths up to 30 feet and replacement as a compacted fill. To mitigate potential lateral spread displacements, remedial measures include complete removal of alluvium down to bedrock at specific, critical locations across canyon drainages and replacement as compacted fill shear keys. The grading envelope required to achieve these necessary mitigations is extensive.

Since the susceptibility of the site to liquefaction is primarily associated with loose alluvial deposits identified within the canyon drainages across the Project site, grading of these areas is necessary to mitigate liquefaction hazards and the potential magnitude of associated liquefaction-induced ground failure, such as seismic settlement and lateral spread displacements.

Section 5.9: Hydrology and Water Quality

The following addition has been made to Page 5.9-12 of the DEIR:

Pursuant to provisions of the Porter-Cologne Water Quality Act, the RWQCB regulates discharging waste, or proposing to discharge waste, within any region that could affect water of the State (California Water Code Section 13260[a]). The Los Angeles Water Board's Basin Plan is aimed at protecting the overall ecosystem associated with a stream, including the associated riparian habitat, and impacts to biological resources within riparian and wetland habitat are within the jurisdiction of the Los Angeles Water Board.

The following revisions have been made to Page 5.9-21 of the DEIR:

LID implementation for the VTTM site and Off-Site Roadway Improvement Area follow the criteria and guidelines provided in the LID Standards Manual. The VTTM site has been designed to pretreat and infiltrate the Stormwater Quality Design Volume (SWQDv), through the use of proposed infiltration basins. The water quality in the infiltration basin would be pretreated by proposed continuous deflective separation (CDS) units. CDS units are used as pretreatment for filtration, detention/infiltration, bioretention, and Low Impact Development designs for stormwater quality control, inlet and outlet pollution control, as well as to meet trash Total Maximum Daily Load (TMDL) requirements. CDS units screen, separate and trap debris, sediment, and hydrocarbons from stormwater runoff. The indirect screening capability of the system allows for 100% removal of floatables and neutrally buoyant material debris 4.7 millimeters or larger, without binding. CDS units retains all captured pollutants, even at high flow rates, and provides easy access for maintenance. The County will be responsible for the maintenance of these CDS units with funding provided through a Drainage Benefit Assessment Area (DBAA) fee paid

with property taxes. During development, the basins will be monitored in conjunction with the erosion control plans by a Qualified SWPPP Provider (QSP). Post development, the County will own the basins and monitoring will be provided by the County with funding provided by the DBAA. The Off-Site Water Line Improvement Area and the Off-Site Sewer Line Improvement Area includes replacement of existing pavement without any increase in impervious surface, and therefore does not require infiltration, retention, filtration, or treatment.

The following revisions have been made to Page 5.9-26 of the DEIR:

Maintaining the current landforms and accommodating the proposed development is not be feasible due to restrictions on the modifications of ridgelines and the existing geology and soils conditions on the site as addressed in the Project's geotechnical analysis report (refer to the Geotechnical Study in **Appendix F** of this Draft EIR). Mass grading for the Project would be accomplished in a single grading operation in order to balance grading on the site, stabilize the remaining hillsides and fully develop the proposed drainage system. All graded slopes will be revegetated to minimize the potential for erosion.

While construction on individual homes and the commercial uses would occur subsequent to grading and development of the proposed lots, phased grading is not feasible for the Project because grading would no longer be balanced and import and export would be required for each phase, which would result in additional construction impacts and result in a substantial increase in the cost of construction.

A SWPPP would be prepared by a Qualified SWPPP Developer (QSD) and implemented for the duration of grading and construction as require by current regulations. The SWPPP will include Best Management Practices (BMPs) to mitigate potential erosion or water quality impacts, including hydroseeding, jute mesh, etc., as necessary to provide protection during the rainy season. The County will require bonds to ensure SWPPP implementation upon completion of mass grading to avoid the potential for an increase in erosion from graded areas that are not fully developed. Implementation of this SWPPP will avoid erosion on individual graded lots that have not yet been developed. Erosion control plans would be reviewed and approved by the County prior to each rainy season.

Existing site conditions, including the amount of flatter areas, liquefaction hazards, etc., and federal, State, and local regulations, which define the required vertical and horizontal standards for the realignment of Del Valle Road to meet sight distance criteria, ridgeline development restrictions, and fuel modification zones, are all factors that constrain the grading design of the Project. Development of the Project site would alter the existing surface water flow characteristics of the site and require modifications to meet pre-post hydrology requirements.

Liquefaction susceptibility is primarily associated with loose alluvial deposits that were identified within canyon drainages across the site, including most of the areas that have been delineated as "jurisdictional" non-wetland waters of the State. Remedial measures are required to reduce the hazard of liquefaction and associated liquefaction-induced ground failures to a level that conforms to the requirements of the California Building Code and Los Angeles County Department of Public Works Geotechnical and Materials Engineering Division. To mitigate seismic settlement potential, remedial measures include widespread removal of alluvial soils to depths up to 30 feet and replacement as a compacted fill. To mitigate potential lateral spread displacements, remedial measures include complete removal of alluvium down to bedrock at specific, critical locations across canyon drainages and replacement as compacted fill shear keys. The grading envelope required to achieve these necessary mitigations is extensive.

Since the susceptibility of the site to liquefaction is primarily associated with loose alluvial deposits identified within the canyon drainages across the Project site, grading of these areas is necessary to mitigate liquefaction hazards and the potential magnitude of associated liquefaction-induced ground failure, such as seismic settlement and lateral spread displacements.

~~Thus, the~~ The Project would reduce or prevent erosion and sediment transport and transport of other potential pollutants from the Project site during the construction phase through implementation of BMPs and compliance with other applicable County requirements to prevent or minimize environmental impacts. Therefore, discharges during the Project's construction would not cause: (1) pollution that would alter the quality of the waters of the State (i.e., SCR) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to a degree that creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health, affect an entire community or neighborhood or any considerable number of persons, and occurs during or as a result of the treatment or disposal of wastes. The BMPs discussed above would ensure effective control of not only sediment discharge, but also of pollutants associated with sediments, such as and not limited to nutrients, heavy metals, and certain pesticides. In addition, BMPs used to control construction water quality are updated over time as new water quality control technologies are developed and become available for use. With implementation of the construction-related BMPs and compliance with all other applicable regulatory requirements, construction of the Project is not anticipated to create pollution, contamination or nuisance as defined in Section 13050 of the CWC or cause a regulatory standard to be violated, as defined in the applicable NPDES stormwater permit or the Basin Plan for the receiving water body. Accordingly, the Project's construction impacts on surface water quality would be less than significant.

The following additions have been made to Page 5.9-27 of the DEIR:

As required by Los Angeles County's hydrology criteria and the County's Low Impact Development (LID) manual, the Project has been designed to result in a similar flow regime to pre-Project conditions through the use of infiltration basins, which was demonstrated in the approved Hydrology Study. The LID manual was designed by the County to comply with the Municipal Separate Storm Sewer System (MS4) permit from RWQCB. The Project would divert existing natural surface flows to basins allowing for percolation/infiltration and storm drain systems to allow post-Project flows that are similar to pre-Project flows.

Ultimately, incorporation of the BMPs anticipated to be implemented as part of Project development would result in an improved quality of runoff flows from the VTTM site and Off-Site Roadway Improvement Area compared to existing conditions. The final selection of BMPs would be completed through coordination with the County as part of the normal building permit process for Project development. Through this process, compliance with the County's LID Ordinance would also occur.

With compliance with NPDES and County requirements, and with implementation of the Project BMPs, impacts associated with surface water quality would be beneficial. As such, the Project's impacts on surface water quality would be less than significant.

The Project has been designed and would be implemented to meet applicable federal, State, and County hydrology and water quality standards, which will result in the mitigation of impacts to water quality to a less-than-significant level. Because the design of the Project meets these existing regulatory requirements, which have been developed to avoid water quality impacts, no additional mitigation is necessary to mitigate the potential impacts of the Project on water quality.

The following addition has been made to Page 5.9-30 of the DEIR:

The infiltration basins would have the capacity for 17.3 acre-feet (af) and would be located in both the northern and southern portion of the VTTM site and the Project's proposed drainage improvements are shown on **Figure 3.0-4: Tract Map Components** in **Section 3.0** of this Draft EIR. More specifically, three debris basins and an infiltration basin would be located in the northern portions of the VTTM site, a single debris basin would be located midpoint along the eastern VTTM site boundary, a single debris basin would be located northwest of the commercial lot, and two infiltration basins would be located in the southwesterly portion of the VTTM site. The natural drainage patterns direct runoff in a southerly direction towards Hunstock Avenue. The existing natural drainage pattern on the site will be completely altered by the proposed mass grading and the existing surface flows will be altered, impervious surfaces will be added

from the proposed development, and an urban storm drain system will be built that will replace the existing natural drainage pattern on the site.

The following addition has been made to Page 5.9-31 of the DEIR:

The Project has been designed and would be implemented to meet applicable federal, State, and County hydrology and water quality standards, which will result in the mitigation of impacts to water quality to a less-than-significant level. Because the design of the Project meets these existing regulatory requirements, which have been developed to avoid water quality impacts, no additional mitigation is necessary to mitigate the potential impacts of the Project on water quality.

The following addition has been made to Page 5.9-32 of the DEIR:

The Project has been designed and would be implemented to meet applicable federal, State, and County hydrology and water quality standards, which will result in the mitigation of impacts to water quality to a less-than-significant level. Because the design of the Project meets these existing regulatory requirements, which have been developed to avoid water quality impacts, no additional mitigation is necessary to mitigate the potential impacts of the Project on water quality.

The following addition has been made to Page 5.9-36 of the DEIR:

The Project has been designed and would be implemented to meet applicable federal, State, and County hydrology and water quality standards, which will result in the mitigation of impacts to water quality to a less-than-significant level. Because the design of the Project meets these existing regulatory requirements, which have been developed to avoid water quality impacts, no additional mitigation is necessary to mitigate the potential impacts of the Project on water quality.

The following addition has been made to Page 5.9-37 of the DEIR:

The Project has been designed and would be implemented to meet applicable federal, State, and County hydrology and water quality standards, which will result in the mitigation of impacts to water quality to a less-than-significant level. Because the design of the Project meets these existing regulatory requirements, which have been developed to avoid water quality impacts, no additional mitigation is necessary to mitigate the potential impacts of the Project on water quality.

Section 5.13.2: Sheriff Protection

The following revision has been made to Page 5.13.2-1, Paragraph 2, of the DEIR:

The Santa Clarita Valley Station of the County of Los Angeles Sheriff's Department is responsible for providing general law enforcement in the Santa Clarita Valley, while the CHP provides traffic control in the vicinity of the Project site. The Santa Clarita Valley Station is located near the intersection of Magic Mountain Parkway and Valencia Boulevard, at 23740 Magic Mountain Parkway in the City of Santa Clarita (City) approximately 8 miles southeast of the Project site.[3] Figure 5.13-1 illustrates the location of the station in relation to the Project site. The existing facility is 24,911 sq. ft. with a vehicle maintenance building of 6,794 sq. ft.[4] ~~A proposed new facility to replace the Santa Clarita Valley Sheriff's Station is currently in the construction stage and will be~~ A new Station located at 26201 Golden Valley Road in the City, approximately ~~nine~~ 14.6 miles southeast of the Project site, opened in November 2021. The Santa Clarita Valley Station currently maintains a staff of 209 sworn deputies, and serves an area of ~~649~~ 656 square miles.[5] Equipment and services provided through the station include 24-hour designated County squad cars, helicopters, search and rescue, mounted posse, and emergency operation centers. The Sheriff's Department also conducts search-and-rescue operations through its Santa Clarita Valley Station. Search-and-rescue operations are generally conducted in mountainous terrain (i.e., for incidents such as downed planes or lost hikers). The Santa Clarita Valley Station search-and-rescue team uses the station's helicopter and has access to the Antelope Valley Station's helicopter. Mutual aid agreements exist with other search-and-rescue teams located within and outside of Los Angeles County. These agreements are organized through the Governor's Office of Emergency Services (OES). Search-and-rescue operations are funded through the Reserve Forces Bureau and private sources. Urban search-and-rescue operations (i.e., rescues from building collapse) are performed by the Los Angeles County Fire Department (LACoFD).

Mitigation Measure MM 5.13.2-1 on Page 5.13.1-11 is revised as follows:

MM ~~5.12.2-1~~ 5.13.2-1 Prior to the issuance of building permits and approval of the final Project design, lighting, and landscape plans, the Project Developer shall provide to the Sheriff's Department final design plans incorporating the Sheriff's Department design requirements, including Crime Prevention through Environmental Design (CPTED) principles, that could reduce demands for service and ensure adequate public

3 Captain Justin R. Diez, Santa Clarita Valley Sheriff Station, Written Communication, April 20, 2020.
4 Rochelle Campomanes, Departmental Facilities Planner, Santa Clarita Valley Sheriff Station, Email Correspondence, July 27, 2020.
5 Captain Justin R. Diez, Santa Clarita Valley Sheriff Station, Written Communication, April 20, 2020.

safety shall be incorporated into the building, lighting, and landscape designs. The design requirements for this project shall include:

- Security lighting in open areas and parking lots in compliance with the requirements of the County's Rural Outdoor Lighting District (Dark Skies) Ordinance;
- Street lighting for the Project's streets in compliance with the requirements of the County's Rural Outdoor Lighting District (Dark Skies) Ordinance;
- Good visibility of doors and windows from the streets and between buildings on the Project site;
- Building address numbers on both residential and commercial uses that are lighted and readily apparent from the streets for emergency response agencies;
- Use of low-growing groundcover and shade trees, where feasible, rather than a predominance of high-growing shrubs that could conceal potential criminal activity around buildings and parking areas.

The above mitigation measure is also added to Section 1.0: Executive Summary, Table 1.0-1: Summary of Project Impacts, of the Draft EIR.

Section 5.17.1: Utilities and Service Systems: Water Supply

The following revision has been made to Page 5.17.1-3, Paragraph 2, of the DEIR:

Recycled water is produced at two water reclamation plants (WRPs) that are owned by the Santa Clarita Valley Sanitation District (SCVSD) of Los Angeles County. The two WRPs, the Valencia WRP and the Saugus WRP, are located within the Santa Clarita Valley. The water is treated to tertiary levels and is discharged to the SCR. The Valencia WRP has a current treatment capacity of 21.6 million gallons per day (MGD), equivalent to 24,190 acre-feet per year (AFY), developed over time in stages. In 2015, the Valencia WRP produced an average of 13.3 MGD (14,900 AFY) of tertiary recycled water. In 2020, the Valencia WRP produced an average of 13.6 MGD (15,250 AFY) of tertiary recycled water. The Saugus WRP has a current treatment capacity of 6.5 MGD (7,280 AFY). In 2015, the Saugus WRP produced an average of 5.1 MGD (5,700 AFY) of tertiary recycled water. In 2020, the Saugus WRP produced an average of 4.6 MGD (5,150 AFY) of tertiary recycled water. Together, the Valencia and Saugus WRPs have a design capacity of 28.1 MGD (31,470 AFY). In 2015, they produced an average of 18.4 MGD (20,600 AFY).

Section 5.17.2: Utilities and Service Systems: Wastewater

The following revision has been made to Page 5.17.2-1, Paragraph 2, of the DEIR:

The Sanitation Districts of Los Angeles County (LACSDs) provide wastewater and solid waste management services to a service area of ~~820~~ 850 square miles. Additionally, LACSDs own, operate, and maintain over 1,400 miles of main trunk sewers and eleven wastewater treatment plants, with a total permitted capacity of 652 million gallons per day (MGD). The LACSDs are comprised of ~~twenty-three~~ twenty-four sanitation districts working cooperatively under a Joint Administration Agreement (JAA). The sanitation district that serves the Santa Clarita Valley area is the Santa Clarita Valley Sanitation District (SCVSD).[6]

The following revision has been made to Page 5.17.2-2, Paragraph 1, of the DEIR:

The Valencia WRP, completed in 1967, is located on the Old Road near the Magic Mountain Amusement Park. The Valencia WRP has a current treatment capacity of 21.6 MGD, equivalent to 24,190 AFY, developed over time in stages. In 2015, the Valencia WRP produced an average of 13.3 MGD (14,900 AFY) of tertiary recycled water. In 2020, the Valencia WRP produced an average of 13.6 MGD (15,250 AFY) of tertiary recycled water. Use of recycled water from the Valencia WRP is permitted under Los Angeles Regional Water Quality Control Board (LARWQCB) Order Nos. 87-48 and 97-072.

The following revision has been made to Page 5.17.2-2, Paragraph 2, of the DEIR:

The Saugus WRP, completed in 1962, is located southeast of the intersection of Bouquet Canyon Road and Soledad Canyon Road. The Saugus WRP has a current treatment capacity of 6.5 MGD (7,280 AFY). No future expansions are possible at the plant due to space limitations at the site. In 2015, the Saugus WRP produced an average of 5.1 MGD (5,700 AFY) of tertiary recycled water. In 2020, the Saugus WRP produced an average of 4.6 MGD (5,150 AFY) of tertiary recycled water. Use of recycled water from this facility is permitted under LARWQCB Order Nos. 87-49 and 97-072.

The following revision has been made to Page 5.17.2-2, Paragraph 3, of the DEIR:

The Saugus and Valencia WRPs operated independently of each other until 1980, at which time the two plants were linked by a bypass interceptor. The interceptor was installed to transfer a portion of flows received at the Saugus WRP to the Valencia WRP. The current combined capacity of the SCVSD system is 28.1 MGD (31,470 AFY), of which 21.6 MGD (24,190 AFY) can be treated at Valencia WRP and 6.5 MGD

6 Sanitation Districts of Los Angeles County (LACSD), *Chloride Compliance Facilities Plan EIR*, accessed April 2020, https://ceqanet.opr.ca.gov/Project/2012011010.

(7,280 AFY) at Saugus WRP The current capacity is sufficient to treat influent flows for the foreseeable future ~~until approximately 2036, at which time planned expansion at the Valencia WRP would bring the total system treatment capacity to 34.1 MGD (38,190 AFY)~~.[7] No expansion is planned at the Saugus WRP.

The following revision has been made to Page 5.17.2-10, Paragraph 4, of the DEIR:

Project construction activities would result in a temporary increase in wastewater generation as a result of construction workers on-site. Wastewater generation would occur incrementally throughout the Project construction period of approximately 4 to 6 years but would be nominal compared to Project operation. Construction contractors working on-site would provide portable, on-site sanitation facilities that would be serviced at approved disposal facilities and/or treatment plants. Portable on-site sanitation facilities would be cleaned, as appropriate, and the wastewater would be transported to the ~~Valencia WRP~~ Saugus WRP for treatment.

The following revision has been made to Page 5.17.2-13, Paragraph 4, of the DEIR:

As shown in **Table 5.17.2-1** above, the Project would generate approximately 64,545 GPD or 0.06 MGD (72.3 AFY) of wastewater. The SCVSD has a current combined treatment capacity of 28.1 MGD and is currently treating 18.4 MGD, not including the recently constructed Vista Canyon Water Factory. The addition of the Project would increase daily treatment to 18.46 MGD, or approximately 0.6 percent of the remaining combined daily treatment capacity of the SCVSD. As such, an adequate treatment capacity would be available during Project operation. ~~Moreover, as discussed previously, the SCVSD total system treatment capacity is expected to increase to 34.1 MGD (38,190 AFY) by 2036.~~ As such, an adequate treatment capacity would be available during Project operation. Therefore, the Project would not affect the treatment capacity of the SCVSD and impacts would be less than significant.

The following revision has been made to Page 5.17.2-15, Paragraph 2, of the DEIR:

The SCVSD has a current daily intake capacity of 28.1 MGD of wastewater and currently intakes 18.4 MGD of wastewater; therefore, it is operating at 65.4 percent of its daily intake capacity. As indicated in **Table 5.17.2-2**, the Project and related projects would generate an average flow of 9,562,234 GPD or 9.6 MGD. The cumulative average flow would increase the daily average wastewater intake to 28.0 MGD, or approximately 100 percent of the combined average daily flow treatment capacity. However, this analysis

7 Santa Clarita Valley Water Agency, *2015 Urban Water Management Plan for Santa Clarita Valley*, accessed April 2020, https://yourscvwater.com/wp-content/uploads/2018/01/2015-FINAL-Urban-Water-Management-Plan-for-Santa-Clarita-Valley_16JUN2017-1.pdf.

does not include the recently constructed Vista Canyon Water Factory which has a capacity of 0.4 MGD (450 AFY).[8] ~~Moreover, an expansion of the Valencia WRP is planned which would bring the total system treatment capacity to 34.1 MGD (38,190 AFY), or the ability to treat an additional 6.0 MGD when compared to current treatment capacity. Thus, there would be additional capacity to treat Project and cumulative project wastewater generation flows.~~ Similar to the Project, each related project would be required to analyze system treatment capacity prior to approval. As such, cumulative impacts associated with wastewater treatment capacity would be less than significant.

The following revision has been made to Page 5.17.2-16, Paragraph 3, of the DEIR:

As shown in **Table 5.17.2-1** above, the Project would generate approximately 64,545 GPD or 0.06 MGD (72.3 AFY) of wastewater. The addition of the Project would increase daily treatment to 18.46 MGD which is within the existing treatment capacity of 28.1 MGD of the SCVSD. ~~Moreover, as discussed previously, the SCVSD total system treatment capacity is expected to increase to 34.1 MGD (38,190 AFY) by 2036.~~ As such, an adequate treatment capacity would be available during Project operation. Impacts would be less than significant.

Section 6.0: Alternatives

The following addition has been made to Page 6.0-6 of the DEIR:

Landform Grading and Phased Grading Alternatives: Maintaining the current landforms and accommodating the proposed development is not be feasible due to restrictions on the modifications of ridgelines and the existing geology and soils conditions on the site as addressed in the Project's geotechnical analysis report (refer to the Geotechnical Study in **Appendix F** of this Draft EIR). Mass grading for the Project would be accomplished in a single grading operation in order to balance grading on the site, stabilize the remaining hillsides, and fully develop the proposed drainage system. All graded slopes will be revegetated to minimize the potential for erosion.

Existing site conditions, including the amount of flatter areas, liquefaction hazards, etc., and federal, state, and local regulations, which define the required vertical and horizontal standards for the realignment of Del Valle Road to meet sight distance criteria, ridgeline development restrictions, and fuel modification zones, are factors that constrain the grading design of the Project. Development of the Project site would

8 PERC Water Corporation, Vista Canyon Water Reclamation Facility, Accessed April 2020, https://percwater.com/project/vista/.

alter the existing surface drainage characteristics of the site and require modifications to meet applicable hydrology requirements.

Liquefaction susceptibility is primarily associated with loose alluvial deposits that were identified within canyon drainages across the site, including most of the areas that have been delineated as "jurisdictional" non-wetland waters of the State. Remedial measures are required to reduce the hazard of liquefaction and associated liquefaction-induced ground failures to a level that conforms to the requirements of the California Building Code and Los Angeles County Department of Public Works Geotechnical and Materials Engineering Division. To mitigate seismic settlement potential, remedial measures include widespread removal of alluvial soils to depths up to 30 feet and replacement as a compacted fill. To mitigate potential lateral spread displacements, remedial measures include complete removal of alluvium down to bedrock at specific, critical locations across canyon drainages and replacement as compacted fill shear keys. The grading envelope required to achieve these necessary mitigations is extensive.

Since the susceptibility of the site to liquefaction is primarily associated with loose alluvial deposits identified within the canyon drainages across the Project site, grading of these areas is necessary to mitigate liquefaction hazards and the potential magnitude of associated liquefaction-induced ground failure, such as seismic settlement and lateral spread displacements.

While construction on individual homes and commercial uses would occur subsequent to grading and development of the proposed lots, phased grading is also not feasible for the Project because grading would no longer be balanced and import and export would be required for each phase, which would result in additional construction impacts and result in a substantial increase in the cost of construction. In addition, as discussed above, grading of the areas susceptible to liquefaction also needs to occur in a single phase to mitigate potential impacts.

3.0 RESPONSES TO WRITTEN COMMENTS

This section includes copies of the comment letters received by the Los Angeles County Department of Regional Planning (LACDRP) on the Draft Environmental Impact Report (EIR). Each letter is numbered and identified for reference and the individual comments in each letter are also identified by number. Each comment letter is followed by written responses to each of the comments in that letter.

A. INTRODUCTION

This section of the Final EIR contains the comment letters that LACDRP received on the Draft EIR. The letters and responses are organized by public agencies, private organizations, public businesses, and individuals. Following each comment letter is a response by LACDRP that supplements, clarifies, or amends information provided in the Draft EIR, that refers the reader to the appropriate place in the Draft EIR or Responses to Written Comments section where the requested information can be found, or that otherwise responds to the comment. Where text changes in the Draft EIR are warranted based upon comments on the Draft EIR, those changes are included in the response following the comment; changes to the text of the Draft EIR as a result of comments are also shown in **Section 2.0: Corrections, Clarifications, and Additions to the Draft EIR**, where all text changes to the Draft EIR can be found. Where updates to mitigation measures are warranted based upon comments on the Draft EIR, those changes are included in the response following the comment and are also shown in **Section 5.0: Mitigation Monitoring and Reporting Program** of this Final EIR.

B. RESPONSES TO COMMENTS RECEIVED WITHIN THE FORMAL 60-DAY REVIEW PERIOD

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

January 10, 2022

Jodie Sackett
Los Angeles County Department of Regional Planning
320 West Temple Street, 13th floor
Los Angeles, CA 90012
JSackett@planning.lacounty.gov

Subject: Sterling Ranch Estates Project, Draft Environmental Impact Report, SCH #2019080092, Los Angeles County Department of Regional Planning, Los Angeles County

Dear Ms. Sackett:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (DEIR) and associated documentation, *Final Biological Technical Report for the Sterling Ranch Estates Residential Project* (BTR), from the Los Angeles Department of Regional Planning (LACDRP) for the Sterling Ranch Estates Project (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code. 1-1

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources. 1-2

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 *et seq.*), CDFW recommends the Project Applicant obtain appropriate authorization under the Fish and Game Code.

Project Description and Summary

Objective: The proposed Project would develop approximately 164.4 acres of land. Development includes 113.9 acres of 222 detached single-family residential lots and approximately 50.5 acres of related off-site components. These off-site components include the following: construction of a one-million-gallon water tank; upsizing of an existing water line; construction of a sewer line; improvements of Del Valle Road; dedication of an off-site trail easement; and dedication of an off-site permanent open space easement. Development also includes 21,000 square feet of commercial use, open space, trails, recreation, stormwater retention, and landscape elements.

Location: The Project site is located at 29053 Coolidge Avenue, Val Verde, CA 91384. The Project site straddles Del Valle Road, south of Hasley Creek Canyon. The community of Val Verde lies south and west of the Project site, the Valencia Commerce Center lies to the east, and residential uses to the west and south. Open space is located north of the Project site. The Santa Clara River is located two miles south of the Project. The Project contains two ephemeral drainages that are tributaries to the Santa Clara River.

1-3

Comments and Recommendations

CDFW offers the comments and recommendations below to assist LACDRP in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring, and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

1-4

Specific Comments

Comment #1: Mountain Lion (*Puma concolor*)

Issue: The Project site occurs within the range of Southern California/Central Coast Evolutionary Significant Unit of mountain lion (mountain lion) habitat and could impact mountain lion.

Specific impacts: The Project as proposed may impact mountain lion by developing 126.5 acres of suitable mountain lion habitat and increasing human presence, traffic, and noise.

Why impacts would occur: The DEIR states, "mountain lions or their sign (i.e., scat and/or tracks) were not observed on the Project site during 2016, 2017, 2018 or 2020 surveys conducted by biologists which consisted of over 248 person hours." However, the DEIR also states, "Species-specific surveys and wildlife camera surveys were not conducted; however, there is high potential [for mountain lion] to move through the Project site based on the presence of suitable habitat and presence of their primary prey item, the mule deer." The DEIR acknowledges that mountain lions may occur within the Project site or in the immediate proximity to the Project. However, the DEIR has stated that there have been no specific surveys or wildlife camera type surveys conducted to determine if mountain lions can be found within the site. Without the species-specific survey efforts, it is possible to miss the presence of the species.

1-5

In addition, the DEIR does not address impacts due to further habitat loss for the species. The Project as proposed would also reduce the habitat available for mountain lion in the Project vicinity. The Project would permanently impact approximately 126.5 acres of Los Angeles County's available habitat for wildlife movement. Habitat loss and fragmentation due to roads and development has driven the southern California mountain lion population towards extinction (Yap et al. 2019). Loss of wildlife connectivity is another the primary driver for the potential demise of the southern California mountain lion population (Yap et al. 2019). Conserving and restoring habitat connectivity and corridors is essential for mitigating impacts to mountain lions. This is especially critical in the face of climate change-driven habitat loss and increased frequency of fires (Yap et al. 2019). Under a high emissions and warm and wet climate scenario, much of the chaparral habitat in southern California that provide habitat for mountain lions would be climactically highly stressed by the year 2070 (Thorne et al. 2016). 1-6

Lastly, the DEIR does not address the anthropogenic impacts the Project will have on mountain lion individuals that may be within the Project site or its vicinity. The Project may increase human presence (e.g., new development, public trail access), traffic, and noise as well as potential artificial lighting during Project construction and over the life of the Project. Most factors affecting the ability of the southern California mountain lion populations to survive and reproduce are caused by humans (Yap et al. 2019). As California has continued to grow in human population and communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions and people (CDFW 2013). As a result, the need to relocate or humanely euthanize mountain lions (depredation kills) may increase for public safety. Mountain lions are exceptionally vulnerable to human disturbance (Lucas 2020). Areas of high human activity have lower occupancy of rare carnivores. Mountain lions tend to avoid roads and trials by the mere presence of those features, regardless of how much they are used (Lucas 2020). Increased traffic could cause vehicle strikes. As human population density increases, the probability of persistence of mountain lions decreases (Woodroffe 2000). 1-7

Evidence impact would be significant: The mountain lion is a specially protected mammal in the State (Fish and G. Code, § 4800). In addition, on April 21, 2020, the California Fish and Game Commission accepted a petition to list an evolutionarily significant unit of mountain lion in southern and central coastal California as threatened under CESA (CDFW 2020). As a CESA candidate species, the mountain lion in southern California is granted full protection of a threatened species under CESA. The Project may have significant impacts because no mitigation has been proposed for any unavoidable direct and indirect impacts from Project activities or subsequent residential development as well as permanent or temporal losses of habitat for mountain lion. 1-8

Recommended Potentially Feasible Mitigation Measure(s):

Recommendation: CDFW recommends LACDRP evaluate the mountain lion territory size and use of habitat within and surrounding the Project vicinity. LACDRP should analyze the effects of increased human presence and area of anthropogenic influence that will now be in on mountain lion habitat, and how it may impact mountain lion behavior, reproductive viability, and overall survival success. Based on these known anthropogenic impacts on mountain lions, CDFW also recommends LACDRP provide compensatory mitigation for impacts to mountain lion. The DEIR should justify how the proposed compensatory mitigation would reduce the impacts of the Project to less than significant. CDFW recommends that the LACDRP recirculate the DEIR for 1-9

more meaningful public review and assessment of the LACDRP's analysis and subsequent mitigation for mountain lion. Additionally, the LACDRP should recirculate the DEIR if the proposed mitigation measures would not reduce potential effects to less than significant and new measures must be required [CEQA Guidelines, § 15088.5(a)(1)].

1-9

Mitigation Measure #1: In addition to the 37.9 acres in the Open Space Dedication Area, CDFW recommends setting aside a minimum of additional 88.6 acres of replacement habitat to have a no net loss of 126.5 acres for wildlife movement. CDFW recommends the replacement habitat be located as near to the Project site as possible. There should be no net loss of suitable habitat for mountain lions. LACDRP should consult and collaborate with CDFW to conserve areas beneficial to the southern California mountain lion population that may improve chances of survival and reproduction of mountain lions in the face of climate change. The mitigation lands should be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity that has been approved to hold and manage mitigation lands pursuant to Assembly Bill 1094 (2012). Assembly Bill 1094 amended Government Code sections 65965-65968. Under Government Code section 65967(c), the lead agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves. An appropriate non-wasting endowment should be provided for the long-term management of mitigation lands. A conservation easement and endowment funds should be fully acquired, established, transferred, or otherwise executed prior to implementing Project-related ground-disturbing activities and prior to LACDRP's issuance of grading permits.

1-10

Mitigation Measure #2: Due to habitat in the Project vicinity, within one year prior to Project implementation that includes site preparation, equipment staging, and mobilization, a CDFW-approved biologist knowledgeable of mountain lion species ecology should survey areas that may provide habitat for mountain lion to determine presence/absence, territory size, and potential for natal dens within a half mile of the Project site. Caves and other natural cavities, and thickets in brush and timber provide cover and are used for denning. Females may be in estrus at any time of the year, but in California, most births probably occur in spring. Surveys should be conducted when the species is most likely to be detected, during crepuscular periods at dawn and dusk (Pierce and Bleich 2003). Survey results including negative findings should be submitted to CDFW prior to initiation of Project activities. The survey report should include a map of potential denning sites. The survey report should include measures to avoid impacts mountain lions that may be in the area as well as dens and cubs, if necessary.

1-11

Mitigation Measure #3: If potential habitat for natal dens is identified, CDFW recommends fully avoiding potential impacts to mountain lions, especially during spring, to protect vulnerable cubs. Two weeks prior to Project implementation, and once a week during construction activities, a CDFW-approved biologist should conduct a survey for mountain lion natal dens. The survey area should include the construction footprint and the area within 2,000 feet (or the limits of the property line) of the Project disturbance boundaries. CDFW should be notified within 24 hours upon location of a natal den. If an active natal den is located, during construction activities, all work should cease. No work should occur within a 2,000-foot buffer from a natal den. A qualified biologist should notify CDFW to determine the appropriate course of action. CDFW should also be consulted to determine an appropriate setback from the natal den that would not adversely affect the successful rearing of the cubs. No construction activities or human intrusion should occur within the established setback until mountain lion cubs have been

1-12

successfully reared; the mountain lions have left the area; or as determined in consultation with CDFW. 1-12

Mitigation Measure #4: If "take" or adverse impacts to mountain lion cannot be avoided either during Project construction and over the life of the Project, LACDRP should consult CDFW and must acquire a CESA Incidental Take Permit (pursuant to Fish & Game Code, § 2080 *et seq*.). 1-13

Mitigation Measure #5: CDFW recommends LACDRP require the Project Applicant to install appropriate public information signage in the residential area and along the trail to: 1) educate and inform the public about wildlife, especially mountain lions, present in the area; 2) advise on proper avoidance measures to reduce human-wildlife conflicts; 3) advise on proper use of open space trails in a manner respectful to wildlife; and 4) provide local contact information to report injured or dead wildlife. Signage should be written in the language(s) understandable to all those likely to recreate and use the trails. Signage should not be made of materials harmful to wildlife such as spikes or glass. LACDRP should require the Project Application to provide a long-term maintenance plan to repair and replace the signs. 1-14

Mitigation Measure #6: CDFW recommends LACDRP require the Project Applicant to place restrictions on types of activities allowed in some areas, such as prohibiting dogs or restricting use of trails near breeding habitat, to aid in minimizing disturbance. Pets should be kept on leash and on trails at all times. Hikers should be encouraged to clean up after their dogs and discourage animal waste as it tends to lead to wildlife avoidance. 1-15

Mitigation Measure #7: Trash receptacles should be placed in areas to avoid creating an unnatural food source that may attract nuisance wildlife and to minimize waste in core habitat areas. 1-16

Mitigation Measure #8: The Project Applicant shall prohibit the use of second-generation anticoagulant rodenticide. 1-17

Comment #2: California Species of Special Concern

Issue: The Project may impact California Species of Special Concern (SSC).

Specific impacts: The Project may result in reduced reproductive capacity, population declines, or local extirpation of an SSC. In addition, permanent loss of foraging, breeding, nesting, or nursery habitat for an SSC may occur.

Why impacts would occur: According to Table 5.3-8, the Project site has the potential to support SSC, which includes burrowing owl (*Athene cunicularia*), Vaux's swift (*Chaetura vauxi*), loggerhead shrike (*Lanius ludovicianus*), coastal California gnatcatcher (*Polioptila californica*), California legless lizard (*Anniella spp.*), San Diegan tiger whiptail (*Aspidoscelis tigris stejnegeri*), Blainville's horned lizard (*Phrynosoma blainvillii*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), San Diego desert woodrat (*Neotoma lepida intermedia*), and American badger (*Taxidea taxus*). Impacts to an SSC could result from increased anthropogenic presence which includes increased noise disturbances, light disturbances, human activity, and dust. 1-18

The mitigation measures in the DEIR for SSC attempts to prevent direct injury or mortality (trampling, crushing) of individuals that are discovered during surveys. However, there is no 1-19

mitigation for the loss of occupied SSC habitat. Typical compensatory mitigation includes the purchase of land consisting of suitable habitat and/or individuals of the impacted species. While the Open Space Dedication Area will have a conservation easement to offset impacts to vegetation communities, it is unclear if there is appropriate habitat there for SSC. Therefore, it is unclear how the mitigation strategy would reduce impacts to SSCs, including the loss of occupied SSC habitat, to less than significant.

1-19

Evidence impact would be significant: A California Species of Special Concern is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

- is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
- is listed as ESA-, but not CESA-, threatened, or endangered; meets the State definition of threatened or endangered but has not formally been listed;
- is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or,
- has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA threatened or endangered status (CDFW 2022a)

1-20

CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065). Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species by CDFW.

Recommended Potentially Feasible Mitigation Measure(s):

When preparing a mitigation strategy for review, CDFW recommends including the following measures, at a minimum, to reduce impacts to less than significant.

Mitigation Measure #1: The qualified biologist should prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. A relocation plan should be prepared prior to implementing any Project-related ground-disturbing activities and vegetation removal.

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While relocation is an option for mitigating impacts, it may not fully account for impacts to an SSC, such as loss of individuals, loss of habitat, or loss of natal dens/middens/burrows. Capturing, handling, or relocation are acts that may have multiple unintended negative consequences, including increased stress and mortality of relocated animals, negative impacts on resident animals at release sites, increased conflicts with human interests, and the spread of diseases. Attempts to avoid impacts to SSC should be the first option.

Mitigation Measure #2: CDFW recommends providing compensatory mitigation for temporary and permanent loss of any habitat supporting SSC. There should be no net loss of habitat

1-22

supporting SSC [CEQA Guidelines, § 15370(e)]. Compensatory mitigation should be provided within the Project boundary at no less than 2:1. Mitigation should provide appropriate habitat (depending on the species), refugia, and habitat structures that supports that species (e.g., woody material, rocks, brush piles, pools, burrows). Any proposed mitigation area/plan should include a discussion on the territory size; nesting, breeding, foraging, and refuge, locations, invasive, non-native plant and wildlife species present, food availability, and how all life cycle functions will be mitigated. Mitigation for impacts to an SSC should adhere to CDFW and/or USFWS established protocol/guidelines if available. 1-22

Comment #3: Impacts to Oak Trees and Tree Replacement

Issue: The Project's proposed mitigation MM 5.3-21 for impacts to 12 coast live oak trees (*Quercus agrifolia*) may be insufficient.

Specific impact: The Project will remove 12 individual oak trees. Replacement activities for mitigation, especially the location of the replacement trees, may not be sufficient to provide no net loss of oak trees on site. In addition, removing these oak trees may cause temporary or permanent impacts to wildlife that utilize the tree as habitat.

Why impacts would occur: MM 5.3-21 states, "The 12 coast live oak trees shall be locally sourced 1-gallon oak trees planted on preferably north-facing slopes within the northwest corner of the VTTM [Vesting Tentative Tract Map No. 60257] site in Fuel Modification Zone C." MM 5.3-21 as it is currently proposed may be insufficient for mitigating impacts to oak trees. A 1:1 mitigation ratio does not account for the potential failure of the replacement oaks that will be planted. In addition, a 1:1 replacement would not account for the temporal loss of oak trees and impacts on oak woodland-dependent birds and wildlife. Even if replacement oak trees survive transplanting, oak tree saplings could remain small and shrubby for many years. It may take 20 to 40 years, potentially longer under drought conditions, for replacement oak trees to reach maturity and provide services such as food, cover, nesting sites, and foraging sites for birds and other wildlife. In addition, the Project may reduce the footprint of available nesting and perching habitat and structure for birds. 1-23

Moreover, the Project proposes to plant oak trees within the Fuel Modification Zone C. Vegetation within fuel modification zones are permanently impacted because vegetation would be regularly thinned, trimmed, and removed, and potentially subjected to controlled burning. According to the Los Angeles County Oak Woodlands Conservation Management Plan (May 2011), activities such as the removal of understory shrubs and limbing/thinning oak trees will result in the loss of structural and species diversity. In addition, these activities may also result in increased fragmentation that will impact long-term sustainability. Oak trees planted for mitigation in Fuel Modification Zone C would be impacted by such disturbance activities, which may impact the success of establishing new trees. 1-24

Evidence impacts would be significant: Oak trees provide nesting and perching habitat for approximately 170 species of birds (Griffin and Muick 1990). Coast live oak and old-growth oak trees (native oak tree that is greater than 15 inches in diameter) are of importance due to increased biological values and increased temporal loss. Due to the historic and on-going loss of this ecologically important vegetation community, oak trees and woodlands are protected by local and State ordinances. The Los Angeles County Oak Tree Ordinance was established to recognize oak trees as significant historical, aesthetic, and ecological resources. CDFW 1-25

considers oak woodlands a sensitive vegetation community. 1-25

The proposed mitigation measures in the DEIR may result in an ultimate total net loss for of oak trees associated with the Project activities. Moreover, trees on site provide habitat for wildlife within the Project vicinity and the mitigation leads to a total net loss of trees on site. These trees may provide adequate habitat for nesting birds and small mammals. Removal of trees on site may temporarily or permanently impact available habitat for wildlife in the area. 1-26

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: CDFW recommends a minimum mitigation ratio of 3:1 for impacts to coast live oak trees. Coast live oak trees may be difficult to establish from seed or sapling, especially under drought conditions. A mitigation of 1:1 would be inadequate if replacement trees are unsuccessful. A higher mitigation ratio would account for mortality and attrition of replacement coast live oak trees, and potential mortality of any oak trees marked for preservation. If all replacement trees survive and reach reproductive maturity, this will have a net benefit for birds. 1-27

Mitigation Measure #2: CDFW recommends that replacement trees are not planted within any fuel modification zone. It is recommended that they are planted in an area suitable for oak growth, especially in areas where oaks are already found, potentially in the Off-site Water Tank Site location 1-28

Mitigation Measure #3: Replacement oaks should be of the same species and come from nursery stock grown from locally sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they were planted. 1-29

Comment #4: Impacts on Slender Mariposa Lily

Issue: The Project's proposed mitigation MM 5.3-1 may be insufficient to mitigate for impacts to slender mariposa lily (*Calochortus clavatus var. gracilis*).

Specific impacts: The DEIR proposes to develop a Slender Mariposa Lily Mitigation and Monitoring Plan (SMLMMP) and translocate slender mariposa lily to the Open Space Dedication Area. Given the experimental nature of translocation, the survival and persistence of translocated slender mariposa lily may be unsuccessful. In addition, increasing the slender mariposa lily population within the Open Space Dedication Area through translocation may exceed the carrying capacity, resulting in increased competition and ultimately unsuccessful establishment. Finally, additional creation or enhancement activities in the Open Space Dedication Area may result in further impacts to the existing slender mariposa lily population and vegetation communities. 1-30

Why impacts would occur: The DEIR states the SMLMMP, "shall include, at minimum 5:1, mitigation for impacts to 171 slender mariposa lily individuals, as well as preservation of the existing population of slender mariposa lily individuals already documented within the Open Space Dedication Area conservation easement. The 5:1 mitigation ratio for planted mariposa lilies shall be affected through overplanting at 10:1 (mitigation plantings: impacted individuals), in order to accommodate potential mortality of slender mariposa lily individuals and the difficulty of censusing populations due to low frequency of flowering." CDFW generally does not support

the use of translocation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.

According to the SMLMMP, there will be 1,668 individual slender mariposa lilies transplanted to the Open Space Dedication Area that already has 42 lilies identified on site. CDFW is concerned that the Open Space Dedication Area may not be able to support an almost 4000 percent increase in number of individuals compared to the existing population. The proposed transplantation may exceed the carrying capacity of the site, resulting in unsuccessful mitigation. In addition, activities associated with transplanting may impact slender mariposa lilies in situ of the Open Space Dedication Area. Transplanting activities (such trampling under foot or wheels, digging new holes for bulbs, soil disturbance, soil compaction) may temporarily disturb or permanently remove other slender mariposa lilies or other vegetation in situ of the Open Space Dedication Area. 1-30

Finally, Options 2 and 3 of MM 5.3-17 include "Creation/enhancement of Palmer's goldenbush within portions of the proposed Open Space Dedication Area conservation easement and/or open space areas within the VTTM site". CDFW is concerned that creation or enhancement activities may impact existing slender mariposa lilies in that area.

Evidence impacts would be significant: Slender mariposa lily has a State rarity ranking of 1B.2. CDFW considers plant communities, alliances, and associations with a State ranking of S1, S2, and S3 as sensitive and declining at the local and regional level. An S1 ranking indicates there are 21 to 100 viable occurrences of this community in existence in California, S2 has six to 20 occurrences, and S1 has fewer than six viable occurrences (Sawyer et al. 2009). Given the State Rarity ranking, inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW and/or United States Fish and Wildlife Service (USFWS). 1-31

Recommended Potentially Feasible Mitigation Measure(s):

Recommendation #1: CDFW recommends LACDRP require the Project Applicant to conduct an assessment of the effects of increased slender mariposa lily individuals and transplantation activities may have on vegetation and wildlife in situ of the Open Space Dedication Area. The DEIR should justify how the proposed compensatory mitigation would reduce the impacts of the Project to less than significant and not cause secondary impacts. 1-32

Recommendation #2: CDFW recommends LACDRP recirculate the Project's environmental document after the assessment to disclose information on the Open Space Dedication Area and potential impacts on those biological resources within that area considering the current mitigation for slender mariposa lily. Per CEQA Guidelines section 15088.5, "a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification." 1-33

Mitigation Measure #1: CDFW recommends mitigation should also include additional off-site, in-kind preservation within the County at the 10:1 ratio proposed, in the event of establishment failure to prevent a net loss of slender mariposa lily. 1-34

Comment #5: Impacts on Palmer's Goldenbush Scrub

Issue: CDFW is concerned that the Project's proposed MM 5.3-17 may still result in net loss of Palmer's goldenbush scrub (*Ericameria palmeri*).

Specific impacts: Implementation of MM 5.3-17 may cause additional impacts to Palmer's goldenbush scrub on the mitigation sites, including the Open Space Dedication Area. Without disclosure of potential impacts on the mitigation sites, unidentified impacts may occur to Palmer's goldenbush scrub, resulting in a net loss to the species.

Why impacts would occur: The DEIR presented three options for mitigation to impacts to Palmer's goldenbush scrub.

- Option 1 requires creation of Palmer's goldenbush at a 1:1 ratio, resulting in 6.7 acres. The mitigation would occur in the on-site open space areas within the 113.9-acre area VTTM site. In addition, Option 1 would require establishment of a conservation easement where 31.9 acres of native scrub (a minimum of 0.2:1 in-kind and up to 5:1 out-of-kind) will be preserved in perpetuity.
- Option 2 requires creation or enhancement of Palmer's goldenbush at a 1:1 ratio, resulting in 6.7 acres. The mitigation would occur within portions of the proposed Open Space Dedication Area and/or open space areas within the VTTM site. Mitigation may also occur with preservation of existing native scrub alliance(s) with Palmer's goldenbush scrub association within portions of the proposed Open Space Dedication Area to total 6.7 acres. It also requires establishment of a conservation easement where 31.9 acres of native scrub (a minimum of 0.2:1 in-kind and up to 5:1 out-of-kind) will be preserved in perpetuity. 1-35
- Option 3 has the same requirement as Option 2. However, if on-site creation, enhancement, or preservation do not achieve a total of 3:1, off-site in-kind habitat creation and/or enhancement will be incorporated to achieve at total of 3:1. Off-site in-kind creation and/or enhancement of Palmer's goldenbush scrub at a mitigation bank, such as Land Veritas, will be established with an acreage appropriate to achieve a total mitigation ratio of 3:1.

For Options 1 and 2, it is unclear where the creation of 6.7 acres of Palmer's goldenbush will occur within the VTTM site or the Open Space Dedication Area. Without identifying the location of the mitigation site, CDFW is concerned that the mitigation site would not be conducive to successful propagation. For example, CDFW is concerned that it would not have the appropriate soil microenvironment, hydrology, carrying capacity, vegetation community, or other biotic and abiotic factors.

Option 2 and 3 include "preservation of existing native scrub alliance(s) with Palmer's goldenbush scrub association within portions of the proposed Open Space Dedication Area." According to the Manual of California Vegetation (2009) second edition, there are no associations with Palmer's goldenbush scrub alliance. Although the Open Space Dedication Area was mapped at an alliance level, the DEIR does not disclose mapping at an association

level. Without mapping associations, CDFW is concerned that the mitigation might preserve a different habitat community than what would be impacted from the Project site. Without verification of the mitigation site, CDFW cannot determine if these preservation efforts are feasible.

Options 2 and 3 include, "Creation/enhancement of Palmer's goldenbush within portions of the proposed Open Space Dedication Area conservation easement and/or open space areas within the VTTM site." These activities may temporarily disturb or permanently remove other vegetation in situ of the VTTM site or the Open Space Dedication Area. In addition, it is unclear if any creation or enhancement activities may impact any of the slender mariposa lilies in that area. Without identifying secondary impacts on the mitigation sites due to the creation/enhancement activities, the Project may result in further unmitigated impacts to Palmer's goldenbush scrub as well as other vegetation communities.

Finally, Option 3 includes "Off-site in-kind creation/enhancement of Palmer's goldenbush scrub at a mitigation bank, such as Land Veritas, will be established with an acreage appropriate to achieve a total of 3:1." It is unknown which mitigation bank would be selected. Therefore, CDFW cannot analyze the appropriateness of the mitigation bank for the species.

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Evidence impacts would be significant: Palmer's goldenbush scrub has a State rarity ranking of 1B.1. CDFW considers plant communities, alliances, and associations with a State ranking of S1, S2, and S3 as sensitive and declining at the local and regional level. An S1 ranking indicates there are 21 to 100 viable occurrences of this community in existence in California, S2 has six to 20 occurrences, and S1 has fewer than six viable occurrences (Sawyer et al. 2009). Given the State rarity ranking, inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW and/or USFWS.

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Recommended Potentially Feasible Mitigation Measure(s):

Recommendation #1: CDFW recommends LACDRP require the Project Applicant to conduct an assessment of each mitigation option and associated activities presented in MM 5,3-17 and the impacts they may have on vegetation and wildlife in situ of proposed areas in the VTTM site as well as the Open Space Dedication Area. The DEIR should justify how the proposed compensatory mitigation would reduce the impacts of the Project to less than significant and not cause secondary impacts.

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Recommendation #2: CDFW recommends LACDRP recirculate the Project's environmental document after the assessment to disclose information on the VTTM site and Open Space Dedication Area and potential impacts on those biological resources within that area considering the current mitigation for slender mariposa lily. Per CEQA Guidelines section 15088.5, "a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification."

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Recommendation #3: If any of the native scrub alliances have an association with Palmers goldenbush scrub exist in areas of the Project site, there should be coordination with CDFW's

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Vegetation Classification and Mapping Program (VegCAMP) to map them according to State-wide standards. 1-39

Mitigation Measure #1: The DEIR should determine which (if any) mitigation bank managed by Land Veritas would be appropriate for the creation/enhancement of Palmer's goldenbush scrub. The bank should have appropriate habitat environment for Palmer's goldenbush scrub. The bank should also be within Los Angeles County and ideally within the vicinity of the Project site. 1-40

Comment #6: Payment into Oak Forest Special Fund

Issue: MM 5.3-20 states that an option for oak tree mitigation is to "Contribute to the County's Oak Forest Special Fund in an amount of $97,040 (two times the canopy cover area value)".

Specific impacts: The DEIR does not evaluate the adequacy of funds and how it offsets the cumulative loss of biological resources associated with oak woodlands.

Why impacts would occur: Under section *III.9.2 Applying for Oak Funds* in The Oak Woodlands Conservation Management Plan (2011), it states that the Oak Forest Special Fund "*CANNOT be used for purchase of lands or easements that are required to satisfy a condition of project approval, including, but not limited to, a mitigation measure required pursuant to CEQA or mitigate a negative declaration (FGC 1366(b)).*" It is unclear how proposed payment to the Oak Forest Special Fund would be adequate to offset impacts associated with the Project to less than significant under CEQA. The DEIR does not explain why the payment is adequate enough for preservation, enhancement, restoration, or other mitigation activities to offset impacts to sensitive species and habitats. The DEIR does not discuss or provide the following information: 1-41

1) How the Oak Forest Special Fund program is designed to (and will) mitigate the effects at issue at a level meaningful for purposes of CEQA;
2) What the fund would acquire. It is unclear if the fund would be used to acquire land for preservation, enhancement, and/or restoration purposes, or if the in-lieu fee would be used to purchase credits at a mitigation bank, or none of the above;
3) Why the fund is appropriate for mitigating cumulative loss of biological resources in the Project site;
4) How the fund is sufficient to purchase land or credits at a mitigation bank;
5) Where LACDRP may acquire land or purchase credits at a mitigation bank so that the in-lieu fee would offset Project impacts on biological resources in the Project site;
6) When LACDRP would use the fee. Mitigation payment does not equate to mitigation if the funds are not being used. Also, temporal impacts on biological resources may occur as long as LACDRP fails to implement its proposed mitigation;
7) How the Project Applicant would commit to paying the fund. For example, when would LACDRP require payment from the Project Applicant, how long would the Project Applicant have to pay the fee, and what mechanisms would LACDRP implement to ensure the fee is paid? Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments (CEQA Guidelines, § 15126.4);
8) What performance measures the proposed mitigation would achieve (CEQA Guidelines, § 15126.4);
9) What type(s) of potential action(s) that can feasibly achieve those performance

standards (CEQA Guidelines, § 15126.4); and,
10) How the in-lieu fee would be adequate such that no impacts would occur as a result of the Project.

In addition, The Oak Woodlands Conservation Management Plan states, "To date, it has been difficult to track these funds and identify who administers the dispersal of County's Oak Forests Special Funds, as well as when and where they have been successfully used to purchase oak woodlands" (Los Angeles County 2011). Since it is unclear where and how the Oak Forest Special Fund is being utilized, CDFW is concerned how the Project would verify that mitigation was implemented and successful in reducing impacts below a significant level.

Evidence impacts would be significant: Without identifying when mitigation activities will be implemented, additional temporal impacts to biological resources would occur. Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by CDFW or USFWS. This Project may have the potential to reduce the habitat of rare plants or wildlife; cause rare plants or wildlife population to drop below self-sustaining levels; threatened to eliminate a plant or animal community; and substantially reduce the number or restrict the range of an endangered, rare, or threatened species [CEQA Guidelines, § 15065(a)(1)]. Additionally, this Project has possible environmental effects that are cumulatively considerable [CEQA Guidelines, § 15065(a)(3)].

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Recommended Potentially Feasible Mitigation Measure(s):

Recommendation #1: CDFW recommends LACDRP revise the Project's environmental document to provide information that would address the following:

1) How the Oak Forest Special Fund is designed to (and will) mitigate the effects at issue at a level meaningful for purposes of CEQA;
2) Why the fund is appropriate for mitigating the cumulative loss of oak trees;
3) Why the fund is sufficient to purchase land or credits at a mitigation bank;
4) Where LACDRP may acquire land or purchase credits at a mitigation bank;
5) When LACDRP would use the fund; and,
6) How the fund would be adequate such that no impacts would occur as a result of the Project.

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The Project's environmental document should provide any technical data, maps, plot plans, diagrams, and similar relevant information in addressing these concerns (CEQA Guidelines, § 15147).

Recommendation #2: CDFW recommends that the environmental document provide a discussion describing how LACDRP intends to commit the Project Applicant to mitigation through payment into the Oak Forest Special Fund. For example, the environmental document should provide specifics as to when LACDRP would require payment, what mechanisms would the LACDRP implement to ensure the fee is paid, and when LACDRP would use the Project Applicant's payment for mitigation. Also, the environmental document should provide specific performance standards and actions to achieve those performance standards.

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Recommendation #3: CDFW recommends that LACDRP recirculate the DEIR for more meaningful public review and assessment of mitigation through payment into the Oak Forest Special Fund. Additionally, the LACDRP should recirculate the DEIR if the proposed mitigation measure (i.e., fund) would not reduce potential effects to less than significant and new measures must be required [CEQA Guidelines, § 15073.5(b)(2)]. 1-44

Comment #7: Tree Diseases, Pests, and Pathogens

Issue: The Project will remove trees and potentially spread material infected with invasive tree diseases, pests, and pathogens.

Specific impacts: The Project may spread invasive tree diseases, pests, and pathogens into areas not currently exposed to these stressors. This could result in expediting the loss of native trees and plant communities. Loss of trees may result in loss of foraging and perching habitat for small mammals, birds, and raptors.

Why impacts would occur: The Project may remove trees that could host diseases and pests. One such pathogen is sudden oak death. Sudden oak death has become the most common cause of mortality of oak (*Quercus* genus) and other native trees (Phytosphere 2015). Mortality rates of oak trees are greater than 50 percent in some areas impacted by sudden oak death (Phytosphere 2012). Tree dieback can have cascading impacts on the habitat and ecosystem, particularly avian distribution and abundance (Monahan and Koenig 2006). Another pest is the polyphagous shot hole borer, which hosts on many native trees species that include box elder (*Acer negundo*), California sycamore (*Platanus racemosa*), willows (*Salix* genus), oaks, cottonwoods (*Populus* genus), and alders (*Alnus* genus) (Calinvasives 2021).
Diseases such as sudden oak death can spread via equipment and transport of infected material. These fragments can be spread to new locations if equipment and tools are not disinfected or cleaned before moving to the next work location. Infected material that is transported off site for disposal may expose trees and plant communities to pest and disease. This could result in expediting the loss of oak woodlands, and other native trees and plant communities within and adjacent to a Project site. 1-45

Evidence impacts would be significant: The Project may have a substantial adverse effect on sensitive natural communities identified in local or regional plans, policies, and regulations or by the CDFW. The Project may result in a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW that are dependent on woodlands susceptible to invasive tree diseases, pests, and pathogens . 1-46

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure: CDFW recommends that the DEIR include a measure to mitigate the spread of invasive pests and diseases by implementing the following: 1-47

1) Prior to tree removal, a certified arborist should evaluate trees for infectious tree diseases including but not limited to: sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2021; UCANR 2021; Phytosphere Research 2012; UCIPM 2013).

2) If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist should prepare an Infectious Tree Disease Management Plan or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list should provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported from a Project site without first being treated using best available management practices described Infectious Tree Disease Management Plan or list of preventative measures.
3) If possible, all tree material, especially infected tree material, should be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.

1-47

Additional Recommendations

Lake and Streambed Alteration Agreement. CDFW has received the Notification for Lake and Streambed Alteration (Notification No. LAN-19965-R5) and looks forward to the coordination regarding the Project. CDFW's issuance of an LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from a lead agency for a project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 *et seq*. and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. To compensate for any on- and off-site impacts to riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures, avoidance of resources, protective measures for downstream resources, on- and/or off-site habitat creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity.

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Nesting Birds. Project activities occurring during the bird and raptor breeding and nesting season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. CDFW recommends LACDRP amend MM 5.3-9 to exclude the ~~strikethrough~~ and include the underlined language:

> *"[…] Within thirty days of ground-disturbing activities associated with construction or grading for the Project that would occur during the nesting/breeding season of native bird species potentially nesting on the site (typically February 15 but as early as January 1 for some raptors through ~~August 31~~ September 15 in the Project region, or as determined by a County-approved biologist), suitable habitat shall be surveyed within seven days prior to initiation of disturbance work by a County-approved biologist to determine if active nests (actively breeding or nesting) of bird species protected by the Migratory Bird Treaty Act and/or the CFGC are present in the disturbance zone or within 300 feet (500 feet for raptors) of the disturbance zone. If initiation of ground-disturbing activities is delayed, then additional pre-disturbance surveys shall be conducted such that no more than seven days will have elapsed between the survey and ground-disturbing activities […]"*

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Data. CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., California Natural Diversity Database (CNDDB)] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Special status species information should be submitted to the CNDDB by completing the Online Field Survey Form (CDFW 2022b). To submit information on special status native plant populations and sensitive natural communities, the Combined Rapid Assessment and Releve Form should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2022c). LACDRP should ensure all pertinent data, such as locations of slender mariposa lily, has been properly submitted, with all applicable data fields filled out, prior to finalizing/adopting the Project's environmental document. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred. LACDRP should provide CDFW with confirmation of data submittal. 1-50

Mitigation and Monitoring Reporting Plan. CDFW recommends LACDRP update the Project's proposed Biological Mitigation Measures and condition the environmental document to include mitigation measures recommended in this letter. CDFW provides comments to assist Lead Agencies in developing mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). LACDRP is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided LACDRP with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A). 1-51

Filing Fees

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089). 1-52

Conclusion

We appreciate the opportunity to comment on the Project to assist LACDRP in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that LACDRP has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at (562) 292-8105 or by email at Felicia.Silva@wildlife.ca.gov. 1-53

Sincerely,

Erinn Wilson-Olgin
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State of California – Natural Resources Agency
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

Attachment A: Draft Mitigation and Monitoring Reporting Plan

CDFW recommends the following language to be incorporated into a future environmental document for the Project.

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		**Timing**	**Responsible Party**
REC-1-Mountain lion Impact Assessment	LACDRP should evaluate the mountain lion territory size and use of habitat within and surrounding the Project vicinity. LACDRP should analyze the effects of increased in human presence and area of anthropogenic influence that will now be in on mountain lion habitat, and how it may impact mountain lion behavior, reproductive viability, and overall survival success. Based on these known anthropogenic impacts on mountain lions, CDFW also recommends LACDRP provide compensatory mitigation for impacts to mountain lion. The DEIR should justify how the proposed compensatory mitigation would reduce the impacts of the Project to less than significant. CDFW recommends that the LACDRP recirculate the DEIR for more meaningful public review and assessment of the LACDRP's analysis and subsequent mitigation for mountain lion. Additionally, the LACDRP should recirculate the DEIR if the proposed mitigation measures would not reduce potential effects to less than significant and new measures must be required [CEQA Guidelines, § 15088.5(a)(1)].	Prior to finalizing EIR	LACDRP
MM-BIO-1-Impacts to Mountain lion – Replacement Habitat	In addition to the 37.9 acres in the Open Space Dedication Area, an additional 88.6 acres of replacement habitat shall be set aside to have a no net loss of 126.5 acres for wildlife movement. The replacement habitat shall be located as near to the Project site as possible. The Project Applicant shall consult and collaborate with	Prior to issuance of grading permits/	LACDRP/Project Applicant

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	CDFW to conserve areas beneficial to the southern California mountain lion population that may improve chances of survival and reproduction of mountain lions in the face of climate change. Those 37.9 acres of mitigation lands shall be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity that has been approved to hold and manage mitigation lands pursuant to Assembly Bill 1094 (2012). An appropriate non-wasting endowment shall be provided for the long-term management of mitigation lands. A conservation easement and endowment funds shall be fully acquired, established, transferred, or otherwise executed prior to implementing Project-related ground-disturbing activities and prior to LACDRP's issuance of grading permits.	Project construction and activities	
MM-BIO-2-Impacts to Mountain lion - Surveys	Due to habitat in the Project vicinity, within one year prior to Project implementation that includes site preparation, equipment staging, and mobilization, a CDFW-approved biologist knowledgeable of mountain lion species ecology should survey areas that may provide habitat for mountain lion to determine presence/absence and potential for natal dens within a half mile of the Project site. Surveys should be conducted when the species is most likely to be detected, during crepuscular periods at dawn and dusk. Survey results including negative findings shall be submitted to CDFW prior to initiation of Project activities. The survey report shall include a map of potential denning sites. The survey report shall include measures to avoid impacts mountain lions that may be in the area as well as dens and cubs, if necessary.	One year prior to Project implementation	Project Applicant
MM-BIO-3-Impacts to Mountain lion – Avoiding Natal Dens	If potential habitat for natal dens is identified, impacts to mountain lions shall be fully avoided, especially during spring, to protect vulnerable cubs. Two weeks prior to Project implementation, and once a week during construction activities, a CDFW-approved biologist shall conduct a survey for mountain lion natal dens. The survey area shall include the construction footprint and the area within 2,000 feet (or the limits of the property line) of the Project	Two weeks prior to Project implementation and once a week during construction activities	Project Applicant

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	disturbance boundaries. CDFW shall be notified within 24 hours upon location of a natal den. If an active natal den is located, during construction activities, all work shall cease. No work shall occur within a 2,000-foot buffer from a natal den. A qualified biologist shall notify CDFW to determine the appropriate course of action. CDFW shall also be consulted to determine an appropriate setback from the natal den that would not adversely affect the successful rearing of the cubs. No construction activities or human intrusion shall occur within the established setback until mountain lion cubs have been successfully reared; the mountain lions have left the area; or as determined in consultation with CDFW.		
MM-BIO-4-Impacts to Mountain lion – Incidental Take Permit	If "take" or adverse impacts to mountain lion cannot be avoided either during Project construction or over the life of the Project, Project Applicant shall consult CDFW to determine if a CESA ITP is required.	Prior to Project construction and activities	Project Applicant
MM-BIO-5-Impacts to Mountain lion – Signage	The Project Applicant shall install signage and provide educational materials to residents and trail users to keep aware of the impacts that human disturbance brings to the surrounding open spaces	During/After Project construction and activities	Project Applicant
MM-BIO-6-Impacts to Mountain lion – Signage	The Project Applicant shall install appropriate public information signage in the residential area and along the trail to: 1) educate and inform the public about wildlife, especially mountain lions, present in the area; 2) advise on proper avoidance measures to reduce human-wildlife conflicts; 3) advise on proper use of open space trails in a manner respectful to wildlife; and 4) provide local contact information to report injured or dead wildlife. Signage shall be written in the language(s) understandable to all those likely to recreate and use the trails. Signage shall not be made of materials harmful to wildlife such as spikes or glass. The Project Applicant shall provide a long-term maintenance plan to repair and replace the signs.	During/After Project construction and activities	Project Applicant

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MM-BIO-7-Impacts to Mountain lion – Restrict Certain Activities	The Project Applicant shall restrict certain types of activities allowed in some areas, such as prohibiting dogs or restricting use to trails near mountain lion habitat. Pets shall be kept on leash and on trails at all times. Hikers shall be encouraged to clean up after their dogs and discourage animal waste as it tends to lead to wildlife avoidance.	After Project construction and activities Project's lifetime	Project Applicant	1-61
MM-BIO-8-Impacts to Mountain lion – Restrict Certain Activities	Trash receptacles shall be placed in areas to avoid creating an unnatural food source that may attract nuisance wildlife and to minimize waste in core habitat areas.	After Project construction and activities Project's lifetime	Project Applicant	1-62
MM-BIO-9-Impacts to Mountain lion – Prohibit Use of Rodenticides	Rodenticides and second-generation anticoagulant rodenticides shall be used.	After Project construction and activities Project's lifetime	Project Applicant	1-63
MM-BIO-10-Impacts on California Species of Special Concern-Relocation Plan	A qualified biologist shall prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. A relocation plan shall be prepared prior to implementing any Project-related ground-disturbing activities and vegetation removal.	Prior to Project-related ground-disturbing activities and vegetation removal	Project Applicant	1-64
MM-BIO-11-Impacts on California Species of Special Concern – Replacement Habitat	Compensatory mitigation shall be provided for temporary and/or permanent loss of any habitat supporting SSC. Compensatory mitigation for shall be provided within the Project site. Compensatory mitigation shall be provided at no less than 2:1. Mitigation shall provide upland and/or aquatic habitat (depending on the species), refugia, and habitat structures that supports that species (e.g., woody material, rocks, brush piles, pools, burrows). Any proposed mitigation area/plan shall include a discussion on the territory size; nesting, breeding, foraging, and refuge, locations,	Prior to/During project ground-disturbing activities	Project Applicant	1-65

	invasive, non-native plant and wildlife species present, food availability, and how all life cycle functions will be mitigated. Mitigation for impacts to an SSC shall adhere to CDFW and/or USFWS established protocol/guidelines if available.		
MM-BIO-12-Impacts on Oak trees – Compensatory Mitigation	A minimum mitigation of 3:1 shall be provided for impacts to coast live oak trees.	Prior to Project construction and activities	Project Applicant
MM-BIO-13-Impacts on Oak trees – Compensatory Mitigation	Replacement oak trees shall not be planted within any fuel modification zone. The Project Applicant shall plant oak trees in the open space area in the northwest corner of the VTTM site.	Prior to Project construction and activities	Project Applicant
MM-BIO-14-Impacts on Oak trees – Compensatory Mitigation	Replacement oak trees shall be of the same species and come from nursery stock grown from locally sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they were planted.	Prior to Project construction and activities	Project Applicant
REC-2-Impacts on Slender Mariposa Lily-	CDFW recommends LACDRP require the Project Applicant to conduct an assessment of the effects of increased slender mariposa lily individuals and transplantation activities may have on vegetation and wildlife in situ of the Open Space Dedication Area. The DEIR should justify how the proposed compensatory mitigation would reduce the impacts of the Project to less than significant and not cause secondary impacts.	Prior to Project construction and activities	Project Applicant
REC-3-Impacts on Slender Mariposa Lily-	CDFW recommends LACDRP recirculate the Project's environmental document after the assessment to disclose information on the Open Space Dedication Area and potential impacts on those biological resources within that area considering the current mitigation for slender mariposa lily. Per CEQA Guidelines section 15088.5, "a lead agency is required to recirculate an EIR when significant new information is added to the	Prior to Project construction and activities	Project Applicant

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	EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification."		
MM-BIO-15-Impacts on Slender Mariposa Lily-Compensatory Mitigation	CDFW recommends mitigation should also include additional off-site, in-kind preservation within the County at the 10:1 ratio proposed, in the event of establishment failure to prevent a net loss of slender mariposa lily.	Prior to Project construction and activities	Project Applicant
REC-4-Impacts on Palmer's Goldenbush Scrub	CDFW recommends LACDRP require the Project Applicant to conduct an assessment of each mitigation option and associated activities presented in MM 5,3-17 and the impacts they may have on vegetation and wildlife in situ of proposed areas in the VTTM site as well as the Open Space Dedication Area. The DEIR should justify how the proposed compensatory mitigation would reduce the impacts of the Project to less than significant and not cause secondary impacts.	Prior to Project construction and activities	Project Applicant
REC-5-Impacts on Palmer's Goldenbush Scrub	CDFW recommends LACDRP recirculate the Project's environmental document after the assessment to disclose information on the VTTM site and Open Space Dedication Area and potential impacts on those biological resources within that area considering the current mitigation for slender mariposa lily. Per CEQA Guidelines section 15088.5, "a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification."	Prior to Project construction and activities	Project Applicant
REC-6-Impacts on Palmer's Goldenbush scrub	If the native scrub alliances have an association with Palmer's goldenbush scrub in areas of the Project site, there should be coordination with CDFW's Vegetation Classification and Mapping Program (VegCAMP) to map them according to State-wide standards.	Prior to Project construction and activities	Project Applicant
MM-BIO-16-Impacts on Palmer's	The DEIR will determine which (if any) mitigation bank managed by Land Veritas would be appropriate for the creation/enhancement of Palmer's goldenbush scrub. The bank shall have appropriate habitat environment for Palmer's	Prior to Project construction and activities	Project Applicant

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Goldenbush scrub	goldenbush scrub. The bank shall also be within Los Angeles County and ideally, within the vicinity of the Project site.		
REC-7-Oak Forest Special Fund	LACDRP should revise the EIR to provide the following information pertaining to payment of in-lieu fees to mitigate for the Project's impact on oak trees: 1) How the Oak Forest Preservation Fund is designed to (and will) mitigate the effects at issue at a level meaningful for purposes of CEQA; 2) Why the in-lieu fee is appropriate for mitigating the cumulative loss of biological resources; 3) Why the in-lieu fee is sufficient to purchase land or credits at a mitigation bank; 4) Where the Project Applicant may acquire land or purchase credits at a mitigation bank; 5) When the Project Applicant would use the in-lieu fee; and, 6) How the in-lieu fee would be adequate such that no impacts would occur as a result of the Project. The EIR should provide any technical data, maps, plot plans, diagrams, and similar relevant information in addressing these concerns (CEQA Guidelines, § 15147).	Prior to finalizing EIR	LACDRP
REC-8- Oak Forest Special Fund	The EIR should provide a discussion describing how the LACDRP intends to commit the Project Applicant to mitigation via the in-lieu fee. For example, the EIR should provide specifics as to when payment would be required, what mechanisms would LACDRP implement to ensure the fee is paid, and when LACDRP would use the project's payment for mitigation. Also, the EIR should provide specific performance standards and actions to achieve those performance standards.	Prior to finalizing EIR	LACDRP
REC-9- Oak Forest Special Fund	LACDRP should recirculate the Project's CEQA document for more meaningful public review and assessment of mitigation through payment of in-lie feeds. Additionally, LACDRP should recirculate the Project's CEQA document if the proposed mitigation	Prior to finalizing EIR	LACDRP

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	measure would not reduce potential effects to less than significant and new measures must be required [CEQA Guidelines, § 15073.5(b)(2)].		
MM-BIO-17-Tree Pests, Pathogens, and Disease	Prior to tree removal, a certified arborist shall evaluate trees for infectious tree diseases including but not limited to: sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*). If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist shall prepare an Infectious Tree Disease Management Plan or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list should provide measures relevant for each tree pest or disease observed.	Prior to Project construction and activities	Project Applicant
MM-BIO-18-Tree Pests, Pathogens, and Disease	To avoid the spread of infectious tree pests and diseases, infected trees shall not be transported from the Project site without first being treated using best available management practices described Infectious Tree Disease Management Plan or list of preventative measures. If possible, all tree material, especially infected tree material, shall be left on site. Pruning and power tools shall be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.	During Project construction and activities	Project Applicant
REC-10-Nesting Birds	Project activities occurring during the bird and raptor breeding and nesting season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. CDFW recommends LACDRP amend MM 5.3-9 to exclude the ~~strikethrough~~ and include the underlined language: "[…] Within thirty days of ground-disturbing activities associated with construction or grading for the Project that would occur during the nesting/breeding season of native bird species potentially nesting on the site (typically February 15 but as early as January 1 for some raptors through ~~August 31~~ September 15 in the Project	Prior to finalizing EIR	LACDRP

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	region, or as determined by a County-approved biologist), suitable habitat shall be surveyed within seven days prior to initiation of disturbance work by a County-approved biologist to determine if active nests (actively breeding or nesting) of bird species protected by the Migratory Bird Treaty Act and/or the CFGC are present in the disturbance zone or within 300 feet (500 feet for raptors) of the disturbance zone. If initiation of ground-disturbing activities is delayed, then additional pre-disturbance surveys shall be conducted such that no more than seven days will have elapsed between the survey and ground-disturbing activities […]"			1-81
REC-11-Data	LACDRP should ensure sensitive and special status species data has been properly submitted to the California Natural Diversity Database with all data fields applicable filled out. To submit information on special status native plant populations and sensitive natural communities, the Combined Rapid Assessment and Releve Form should be completed and submitted to CDFW's Vegetation Classification and Mapping Program. Confirmation of data submittal should be provided to CDFW.	Prior to finalizing EIR	LACDRP	1-82
REC-12-Mitigation and Monitoring Reporting Plan	LACDRP should update the Project's proposed Biological Resources Mitigation Measures and condition the environmental document to include mitigation measures recommended in this letter. LACDRP is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures.	Prior to finalizing EIR	LACDRP	1-83

COMMENT LETTER NO. 1:

State of California – Natural Resources Agency
Department of Fish and Wildlife
Erinn Wilson-Olgin
Environmental Program Manager I
South Coast Region
3883 Ruffin Road San Diego, CA 92123

Comment 1-1:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Environmental Impact Report (Draft EIR) and associated documentation, Final Biological Technical Report for the Sterling Ranch Estates Residential Project (BTR), from the Los Angeles Department of Regional Planning (LACDRP) for the Sterling Ranch Estates Project (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

Response 1-1:

This is an introductory comment thanking LACDRP for the opportunity to comment on the Draft EIR. LACDRP acknowledges receipt of the CDFW comment letter. Detailed responses to each individual comment in the letter are provided below.

Comment 1-2:

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq*.). Likewise, to the extent implementation of the Project as proposed may result in "take," as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq*.), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish

& G. Code, §1900 *et seq*.), CDFW recommends the Project Applicant obtain appropriate authorization under the Fish and Game Code.

Response 1-2:

LACDRP acknowledges CDFW's role and responsibilities as a Trustee Agency and a Responsible Agency pursuant to the CEQA Guidelines. This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no further response is necessary.

Comment 1-3:

Objective: The proposed Project would develop approximately 164.4 acres of land. Development includes 113.9 acres of 222 detached single-family residential lots and approximately 50.5 acres of related off-site components. These off-site components include the following: construction of a one-million-gallon water tank; upsizing of an existing water line; construction of a sewer line; improvements of Del Valle Road; dedication of an off-site trail easement; and dedication of an off-site permanent open space easement. Development also includes 21,000 square feet of commercial use, open space, trails, recreation, stormwater retention, and landscape elements.

Location: The Project site is located at 29053 Coolidge Avenue, Val Verde, CA 91384. The Project site straddles Del Valle Road, south of Hasley Creek Canyon. The community of Val Verde lies south and west of the Project site, the Valencia Commerce Center lies to the east, and residential uses to the west and south. Open space is located north of the Project site. The Santa Clara River is located two miles south of the Project. The Project contains two ephemeral drainages that are tributaries to the Santa Clara River.

Response 1-3:

The comment provides a summary description of the Project. This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no further response is necessary.

Comment 1-4:

CDFW offers the comments and recommendations below to assist LACDRP in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive management strategies as part of the Project's CEQA mitigation, monitoring, and reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).

Response 1-4:

The comment states the letter offers comments and recommendations to assist LACDRP in identifying, avoiding, and/or mitigating potentially significant direct and indirect impacts on biological resources and recommends that the measures or revisions included in the CDFW comment letter be incorporated into the Project's CEQA mitigation, monitoring, and reporting program (Pub. Resources Code, § 21081.6; CEQA

Guidelines, § 15097). Responses to each of the suggested measures or recommendations are provided below.

Comment 1-5:

Issue: The Project site occurs within the range of Southern California/Central Coast Evolutionary Significant Unit of mountain lion (mountain lion) habitat and could impact mountain lion.

Specific impacts: The Project as proposed may impact mountain lions by developing 126.5 acres of suitable mountain lion habitat and increasing human presence, traffic, and noise.

Why impacts would occur: The Draft EIR states, "mountain lions or their sign (i.e., scat and/or tracks) were not observed on the Project site during 2016, 2017, 2018 or 2020 surveys conducted by biologists which consisted of over 248 person hours." However, the Draft EIR also states, "Species-specific surveys and wildlife camera surveys were not conducted; however, there is high potential [for mountain lion] to move through the Project site based on the presence of suitable habitat and presence of their primary prey item, the mule deer." The Draft EIR acknowledges that mountain lions may occur within the Project site or in the immediate proximity to the Project. However, the Draft EIR has stated that there have been no specific surveys or wildlife camera type surveys conducted to determine if mountain lions can be found within the site. Without the species-specific survey efforts, it is possible to miss the presence of the species.

Response 1-5:

This comment states that the proposed development may directly impact 126.5 acres of mountain lion habitat and cause indirect impacts from an increase in human presence, traffic, and noise. Furthermore, it states that the presence of mountain lions on or near the site may have been missed because a species-specific survey for mountain lions was not conducted, thereby suggesting that the Draft EIR didn't completely address potential impacts to the mountain lion without the survey. In the Draft EIR, the potential for presence of the mountain lion to occur was assessed in Table 5.3-8. There it stated that mountain lions have a high potential to move through the Project site based on the presence of their primary prey, the mule deer, which was observed on several occasions. Additionally, in Section C: Project Impacts, the Draft EIR discusses the habitat needs of the mountain lion such as dense growth and cover, which occurs sporadically on site. Even without surveys, the Draft EIR recognizes that there is potential for the presence of mountain lions based on the suitability of the existing habitats found on the Project site (i.e., scrub), the presence of prey (i.e., mule deer), the habitat characteristics of nearby natural lands, and wildlife corridors to the west/northwest. The land use pattern around the Project site is restrictive to the mountain lions accessing the site except for the natural lands to the northwest and southeast of the site that connect to the Project site. In conclusion, the Draft EIR acknowledges mountain lions are present in the area, and individual mountain lions occasionally may be present on the site (see Draft EIR page 5.3-82); the size of the Project site and majority of the habitats on site and surrounding developed lands are not ideal for long-term survival of the mountain lion. The Draft EIR sufficiently addresses indirect impacts.

Please refer to pages 5.3-82 through 5.3-87, which address indirect impacts to the mountain lion and to *Response to Comment 1-6* for direct impacts to on-site habitat(s). Additionally, under *Response 1-6*, the cumulative impact to regional mountain lion movement is addressed and Mitigation Measure (MM) **MM 5.3-28** is proposed to compensate for the contribution of the Sterling Ranch Estates Project to this impact. Please refer to the Mountain Lion Impact Analysis for the Sterling Ranch Estates Residential Project for a thorough Project-specific and cumulative impact analysis for mountain lions (see **Appendix B.1**, Dudek 2022).

Concurrent with the completion of the Draft EIR, a featured article titled "Big Cats in the Big City: Spatial Ecology of Mountain Lions in Greater Los Angeles" by Seth Riley, Jeff Sikich, and John Benson was published by the Journal of Wildlife Management Vol. 85(8) (November 2021) (article; Riley et. al. 2021).[1] The focus of the article was to better understand mountain lion use near urban and managed areas, which included three predictors: 1) home range, 2) landscape use, and 3) resources selection. To analyze these predictors, researchers utilized global positioning system (gps) collar telemetry data and modeling software. The conclusions of this study support the information, analysis, and conclusions regarding the potential for the Project to result in significant impacts to mountain lions as described below.

Home range. Home range is considered the same as territory for the purposes of the article (Jeff Sikich, National Park Service, pers. comm.). The study estimated the territories for 29 tracked mountain lions, including seven in the Santa Susana Mountains including one north of State Route 126 (SR-126). The study did not identify a mountain lion on or immediately adjacent to the Project site using telemetry data during the 14-year study (2002 to 2016); however, one adult male established a portion of his home range approximately 1.5 miles or 8,000 feet to the northwest of the Project site, but never entered the Project site over the study period. For reference, the mean home range is 91,923 acres for adult male mountain lions and 33,122 acres for female mountain lions. If the entire Project site was part of the territory of a mountain lion in the area, it would only consist of a small percentage of its territory (i.e., 0.12% of the average home range for a male and 0.34% of the average home range for a female, respectively). The Draft EIR correctly states that a mountain lion may on occasion use the Project site based on mean home range size and the type and quality of the habitat on the Project site.

Landscape Use. For all mountain lions studied (adult and juvenile male and female), 0.9% of locations where mountain lions were present consisted of developed areas, and 2.6% of locations were altered open areas, meaning mountain lions were located in natural areas >95% of the time (Riley et. Al. 2021). In this study, altered open spaces were defined as areas modified by humans to a lesser extent than completely

1 Riley et al. (Riley, S. P. D., J. A. Sikich, and J. F. Benson). 2021. Big Cats in the big city: Spatial ecology of mountain lions in greater Los Angeles. Journal of Wildlife Management 85:1527-1542.

developed areas and included golf courses, schools, landscaped areas such as city parks, low-density residential areas. The Project site is undeveloped land, however, directly surrounding the site to the west, south, and partly to the east and north is the community of Val Verde. Further to the south are undeveloped lands, commercial development, the Chiquita Canyon Landfill, and oil development. Approximately 0.5 miles to the east is commercial/industrial development and then dense residential neighborhoods of the City of Castaic. Directly to the north is a BMX Track and undeveloped land, however, approximately 0.5-mile north is residential development of Hasley Canyon and denser neighborhoods of Castaic. Based on this study, development nearly surrounds the Project site, which in addition to habitat suitability (discussed below), greatly reduces the attractiveness of the site for hunting, sheltering, and denning by mountain lions. Northwest of the Project site is the only direction that has a direct connection to additional undeveloped lands containing high quality mountain lion habitat (See **Appendix B.1**, Dudek 2022). The land to the south and southeast is considered poor quality habitat and is proposed for residential development as part of Newhall Ranch, particularly along SR-126. See *Response 1-8* and **Exhibits 5**, **6**, and **7** below.

Resource Selection (Habitat Suitability). Of the natural landcover in Los Angeles County, chaparral was the most common vegetation type used by the mountain lion, with chaparral used close to or greater than 50% of the time, followed by coastal sage scrub at approximately 20% of the time. The 0.70 acre of chaparral and 79.7 acres of coastal scrub present on the Project site occurs in patchy areas separated by regularly maintained dirt roads and open grass and herb-dominated areas, decreasing the continuity of these key coastal scrub and chaparral vegetation communities in a manner that results in poor cover habitat for mountain lions. The majority of the scrub habitats on the Project site are 30 to 60 percent absolute cover in the shrub canopy, meaning these are “open” or “thinner” scrub habitats or short vegetation structure (40 to 70 percent of the habitat does not have shrub or treed vegetation, but may partially contain bare ground or annual or perennial forbs and grasses). For instance, Palmer’s goldenbush scrub, a transitional or successional community, grows less than 1.0 meter tall and is open with lower percent coverage often in disturbed or recovering lands. These types of habitats are not typically preferred by mountain lions. The Project would impact 42.8 acres (53.7%) of the coastal scrub habitat on the Project site would be impacted by the Project.

Per Riley et. Al. (2021):

> *Overall, the mountain lions in our study consistently selected native vegetation types with dense cover: chaparral, riparian woodland, and coastal sage scrub. The two features of the landscape that they consistently avoided were grasslands and altered open areas, which were also the most open portions of the landscape. These results are consistent with previous work showing that mountain lions select areas with dense stalking cover and avoid open areas to facilitate hunting*

success (Atwood et al. 2007), and in a statewide analysis including 13 different study areas, Dellinger et al. (2020) reported selection for shrub cover and avoidance of open areas.

The combination of the three predictors analyzed In the paper supports the Draft EIR conclusion that while mountain lions may utilize the Project site on occasion, and possibly as part of a mountain lion's territory, due to location, the land use pattern around and near the Project site, and habitat suitability, no significant impact to mountain lion or its habitat would occur from development of the Project.

This comprehensive study, based on 14 years of GPS collar telemetry data did not identify a mountain lion on the Project site, as shown in **Exhibit 1**. One adult male established a portion of his home range approximately 1.5 miles (8,000 feet) to the west/northwest of the Project site, but never entered the Project site over the 14-year study period. In addition, as discussed above, given the typical territory for mountain lions, if the site were part of the home range of a mountain lion, it would constitute a small portion (less than 1%) of the average home range of any mountain lion. Additionally, the CDFW mountain lion habitat selection model identifies the site as unsuitable (Dellinger et. al. 2019). Most of the Project site, 87.37%, is considered poor suitability for mountain lions. There is no good habitat available on-site per the model (see **Appendix B.1**). Further species-specific surveys for mountain lions are not needed to determine the potential for the Project to result in significant impacts to mountain lions as this comprehensive study provides sufficient information regarding the presence/absence of mountain lion on the Project site and the decreased value of the habitat on the Project site for mountain lions. Conducting additional site-specific studies, such as a camera tracking study on the Project site, would not provide further clarity of presence/absence of a mountain lion since the Draft EIR already assumes mountain lions may occasionally visit the due to the presence of their primary prey item, the mule deer, on the Project site and in the surrounding area and the presence of some habitat elements, although low quality to mountain lion, of chaparral and coastal scrub. Please refer to the Mountain Lion Impact Analysis for the Sterling Ranch Estates Residential Project (see **Appendix B.1**, Dudek 2022).

Based on the information in the Draft EIR, as supported by the information in Riley et al. (2021), no significant impacts to mountain lions would occur from development of the Project and, for this reason, no additional studies are needed to determine the potential impacts of the Project on mountain lions.

Nonetheless, the Project Applicant has agreed to a pre-construction camera survey for mountain lions as a condition of the draft CDFW Lake and Streambed Alteration Agreement to avoid the potential for construction of the Project to result in impacts to any mountain lion that may be present in the area at the time construction is initiated. Please refer to *Response to Comment 1-13* below.

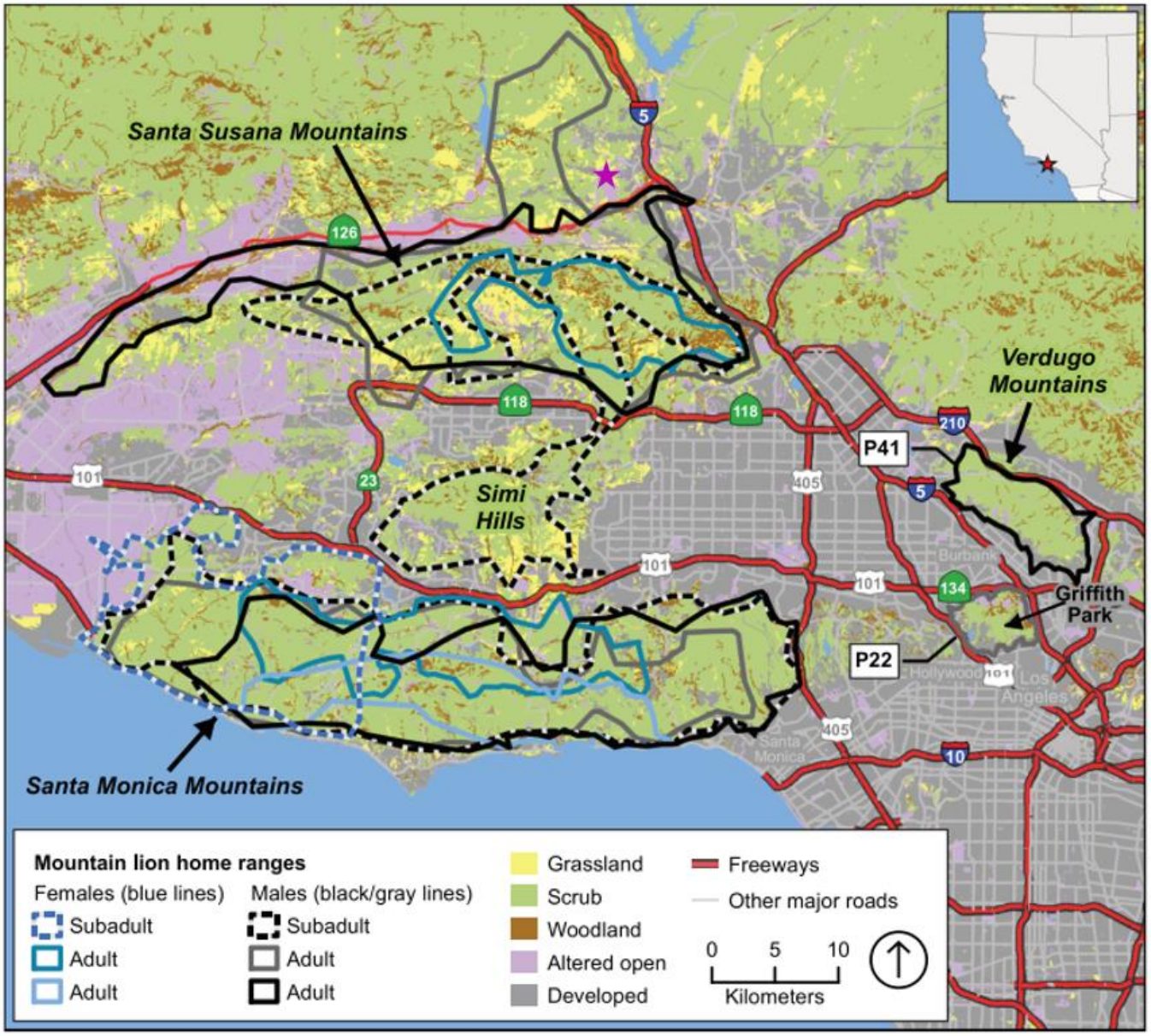

Exhibit 1. Mountain lion home ranges 2002-2016. (Riley et al. 2021)

Measures to address potential indirect impacts associated with the increase in human presence, traffic, and noise that would be associated with the Project are found in *Response 1-7*.

Please also see *Response 1-6* for a discussion of the potential for the Project to result in the loss of mountain lion habitat.

Comment 1-6:

In addition, the Draft EIR does not address impacts due to further habitat loss for the species. The Project as proposed would also reduce the habitat available for mountain lions in the Project vicinity. The Project would permanently impact approximately 126.5 acres of Los Angeles County's available habitat for wildlife movement. Habitat loss and fragmentation due to roads and development has driven the southern California mountain lion population towards extinction (Yap et al. 2019). Loss of wildlife connectivity is another the [*sic*] primary driver for the potential demise of the southern California mountain lion population (Yap et al. 2019). Conserving and restoring habitat connectivity and corridors is essential for mitigating impacts to mountain lions. This is especially critical in the face of climate change-driven habitat loss and increased frequency of fires (Yap et al. 2019). Under a high emissions and warm and wet climate scenario, much of the chaparral habitat in southern California that provide habitat for mountain lions would be climactically highly stressed by the year 2070 (Thorne et al. 2016).

Response 1-6:

The potential for the Project to result in Project-specific and cumulative impacts to habitat loss, wildlife movement loss, and habitat fragmentation for mountain lions are addressed below for Project-specific impacts, as well as cumulative impacts to mountain lions.

Project-Specific Impacts for Mountain Lion Movement

Habitat Loss. Chaparral vegetation was identified as important in terms of habitat use and resource selection, highlighting the importance of this habitat for the conservation of mountain lions in southern California (Riley et. al. 2021) as chaparral was the most common vegetation type used by mountain lions, at close to or >50% of the time. As identified in Table 5.3-1 in the Draft EIR, 0.7 acre or 0.42 percent of the Project site, including the off-site improvement areas, contains chamise-black sage chaparral.

The Project's impact on 0.7 acre of isolated chaparral would not be a significant loss of this habitat to the mountain lion.

Riley et. al. found that coastal sage scrub habitat accounted for 20% of mountain lion use. The Project will remove 42.8 acres of coastal scrub habitat as described in *Response 1-5*. Due to the open and shorter stature vegetation associations of the coastal scrub located on the Project site, the removal of 42.8 acres would not be a significant loss of this habitat to the mountain lion and is not expected to significantly impact the mountain lion or its habitat (including home range or territory). Additionally, the 14-year study

by Riley et. al. (2021) did not record a mountain lion on the Project site, as discussed in *Response 1-5*. As previously stated, the Draft EIR analysis acknowledges the potential for the occasional presence of the mountain lion on the Project site and analyzes the potential for the Project to result in significant impacts to mountain lions.

Wildlife movement. Particularly for the mountain lion, wildlife movement was also considered in the Draft EIR's assessment of potential impacts to mountain lions. As shown on **Exhibit 2**, the Project site is adjacent to existing development with existing residential development to the west and south of the Project site, the 1,000,000-square-foot industrial IAC Commerce Center to the east of the Project site, and an active off-road vehicle racetrack directly to the north with the larger communities of Castaic and Hasley Canyon further north of the Project site. From a regional perspective, Interstate 5 (I-5), located approximately 2.0 miles to the east of the Project site, is a major barrier to wildlife movement with additional wildlife connectivity restrictions from the industrial park approximately 0.2 mile to the east of the Project site, residential developments to the north, south, and southwest, and the Chiquita Canyon Landfill, SR-126, and the approved Newhall Ranch Specific Plan project, with the first phase development in the Mission Village portion of Newhall Ranch currently underway to the south. These existing and approved developments constrain wildlife from moving through the Project site from all directions except the northwest. From a regional standpoint, the Project site (indicated by the blue star in **Exhibit 3**) is located over 6.5 miles outside of the Los Padres National Forest/Sespe Wilderness Area, shaded in green in **Exhibit 3**, north and west of Lake Piru Recreation area.

South of the Project site, Chiquita Canyon was identified by the County of Los Angeles as a possible local movement area through a landfill, which lies south and east of Val Verde, and west of the commercial development that would provide access to the Project site. Although the Project off-site open space dedication area is near this area, the approximately 700- to 1,100-foot (0.2 miles at widest) gap between the residential and commercial developments is above the landfill with steep topography. Additionally, the existing Val Verde residential neighborhood is along Chiquita Canyon Road and borders the landfill. Reviewing the Dellinger et al. (2019) model, almost this entire area is characterized as poor suitable habitat for mountain lions, except for the habitat near SR-126 and the tops of the hills (**Exhibit 1**). The small open space area between SR-126 and the Project site contains low-quality habitat for mountain lions. In addition, the Riley et al. (2021) long-term study identified a mountain lion territory west of the Project site in the high-quality habitat area. Over the long-term study, no data points indicated that the mountain lion from the nearest established mountain lion territory, nor any other collared mountain lion, ventured onto the Project site (see **Appendix B.1**).

The Draft EIR references the South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion (South Coast Wildlands 2008) study, which identified and prioritized landscape linkages widely

considered to be the backbone of a conservation strategy for Southern California. The Project site is located outside the landscape linkages identified in this study. The Sierra Madre–Castaic Connection, shown in green in **Figure 3.0-4: Exhibit 4**, located approximately 2.3 miles to the north of the Project site, connects the Los Padres and Angeles National Forests. The Santa Monica–Sierra Madre Connection (as shown in dark purple in **Figure 3.0-4: Exhibit 4**), approximately 2.5 miles to the west of the Project site, stretches from the Santa Monica Mountains to the peaks of the Santa Susana Mountains and the Sierra Madres Ranges of the Los Padres National Forest (South Coast Wildlands 2008).

As shown in **Exhibit 4**, Val Verde and the Project site are located outside of both of these landscape linkage areas. The Project site is located closer to the residential and industrial developments in Hasley Canyon and Castaic than these regional open space areas.

As discussed in Riley et al. (2021), which radio-tracked mountain lions in Los Angeles and Ventura counties from 2002 through 2016, overall mountain lion use of urban areas was very low and shrub vegetation types, especially chaparral, were identified as important in terms of mountain lion habitat use and resource selection. More specifically, the radio-tracked mountain lions consistently selected native vegetation types with dense cover: chaparral, riparian woodland, and coastal sage scrub. As discussed above, the Project site contains coastal scrub and chaparral vegetation communities, which comprise slightly more than one third of the Project area; however, this vegetation is interspersed with open areas of grass and herb-dominated vegetation communities and disturbed and developed lands. The coastal scrub and chaparral on the Project site occur in patchy areas within regularly maintained dirt roads and open grass and herb-dominated areas decreasing the continuity of these key coastal scrub and chaparral vegetation communities. In general, the coastal scrub and chaparral vegetation communities on the Project site have a relatively short canopy height and are located on slopes. No continuous dense chaparral or coastal scrub connects the site to off-site areas, resulting in the habitat present on the Project site being less desirable to mountain lions.

Habitat Fragmentation. As described in the Draft EIR, the Project is adjacent to existing residential and industrial development. The Project site is outside the Sierra Madre-Castaic Connection and Santa Monica-Sierra Madre Connection in the South Coast Missing Linkages Project landscape linkages (South Coast Wildlands 2008). Although there is potential for mountain lion to be present occasionally on the Project site based on the types of habitats on the site and presence of their primary prey item, mule deer, the Project site is adjacent to residential and industrial development on three sides and does not provide high quality habitat for mountain lion use. Due to its location and type and quality of habitat on the Project site, development of the Project would not further fragment mountain lion habitat.

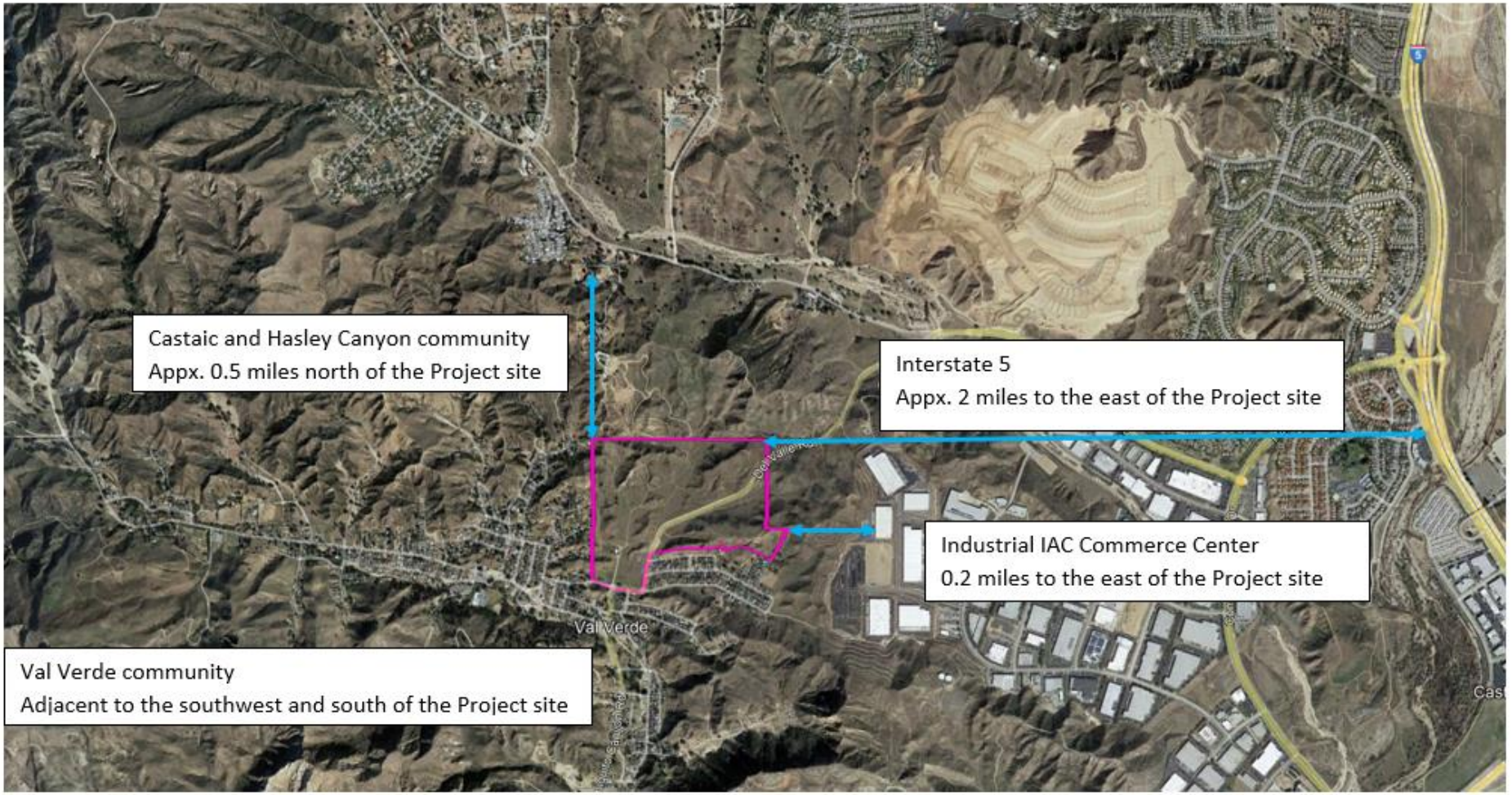

Exhibit 2. Relative location of the Project (pink) and surrounding development

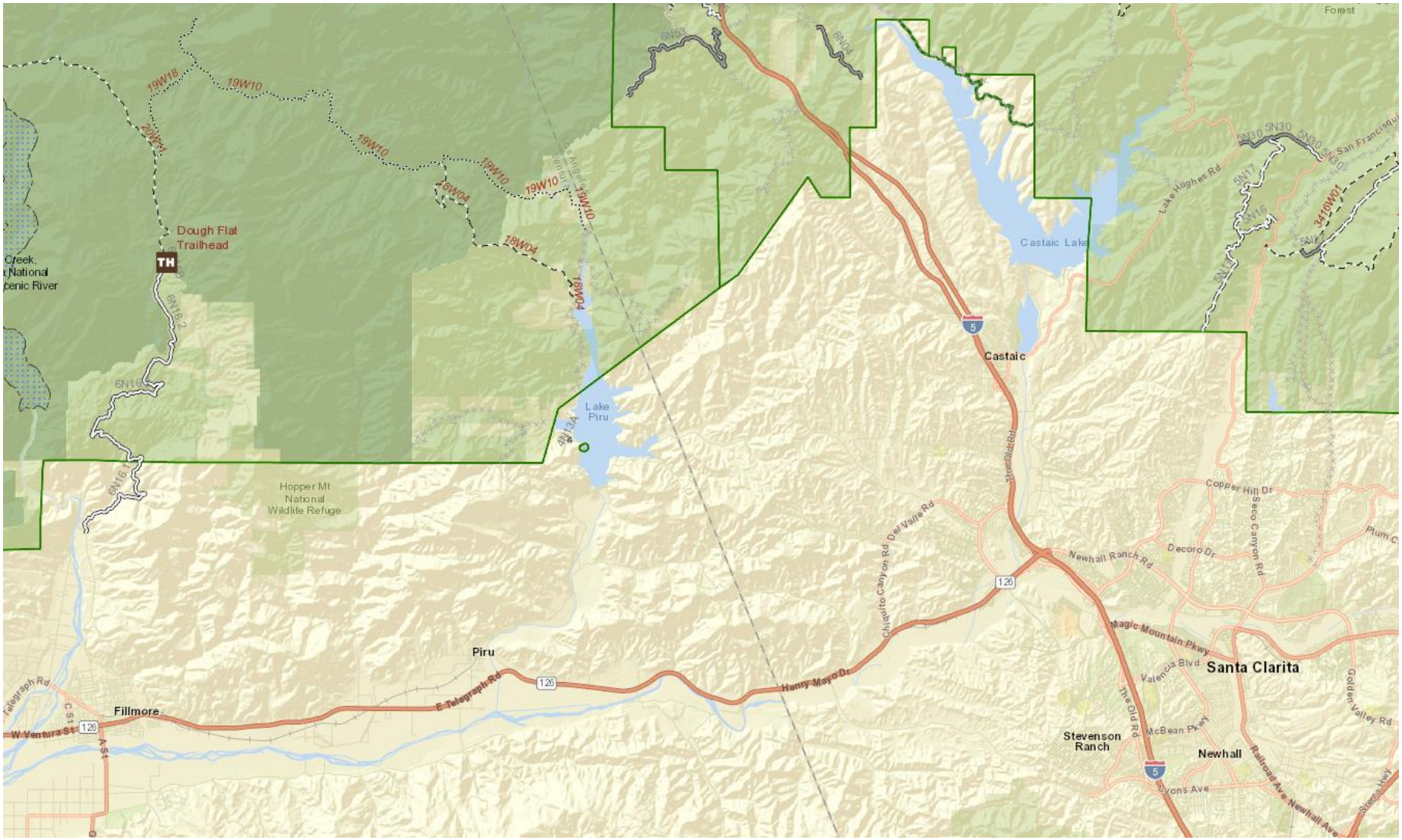

Exhibit 3. Relative location of the Project site (blue star) and Los Padres National Forest (green shading).

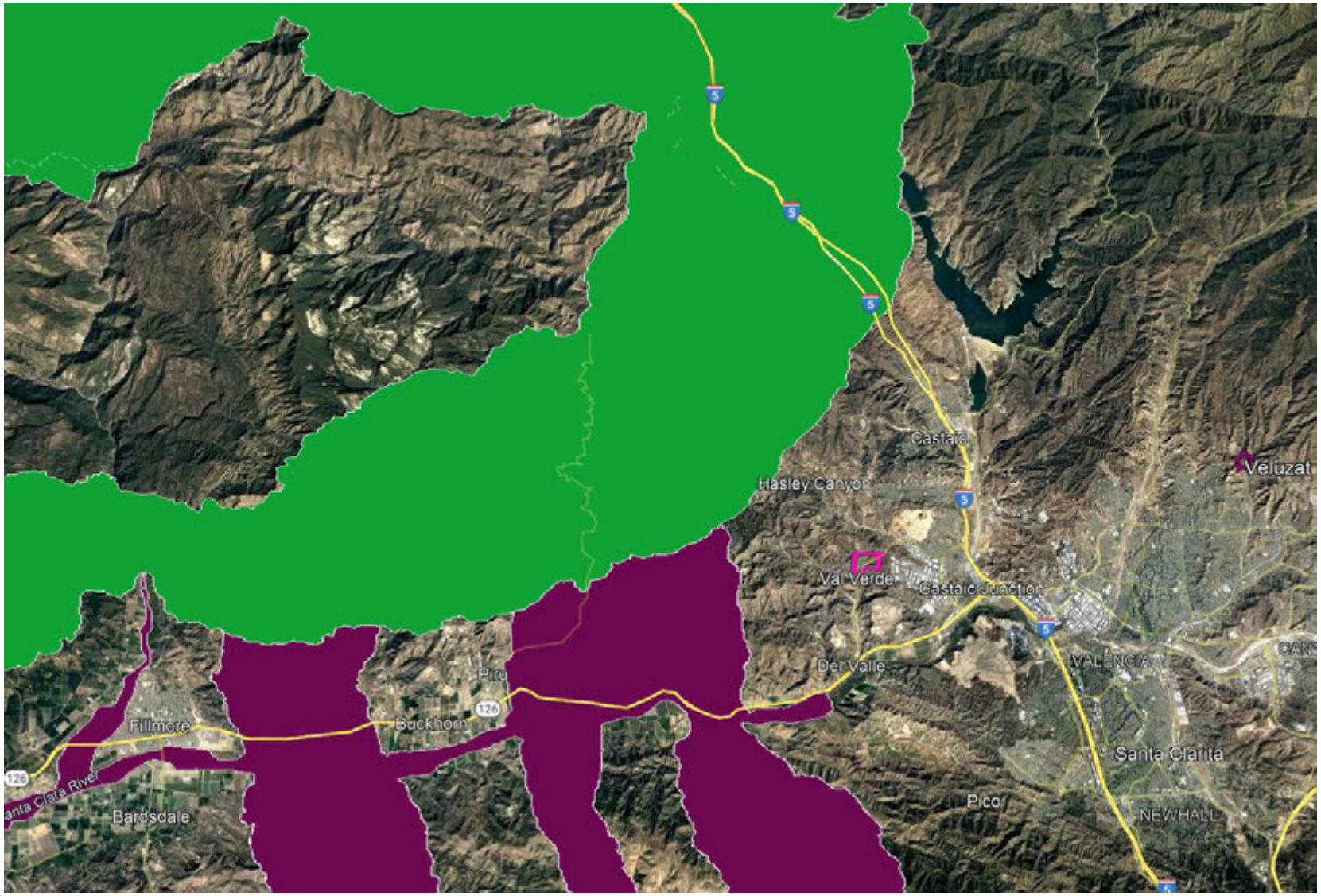

Exhibit 4. South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion. Sierra Madre–Castaic Connection (green). Santa Monica–Sierra Madre Connection (dark purple) (South Coast Wildlands 2008, Google Earth Pro 2022

The Project would not significantly impact the Central Coast South (CC-S) mountain lion population or range. The Project is a small fraction of the development occurring in the region, and less so throughout the range of the Central Coast South mountain lion population. As previously described, the site is situated in an area that currently has a significant amount of existing and/or current development and represents the extension of the existing community of Val Verde north onto the Project Site, which contains low-quality habitat.

Given the Project Site's distance from regional wildlife corridors, adjacent development on all but the northwest side of the Project site constraining wildlife movement, and the small amount of suitable habitat for mountain lion on the Project site, the Project-specific impacts would result in less-than-significant impacts to movement of mountain lions.

Cumulative Impacts for Mountain Lion Movement

To understand the potential cumulative impacts to mountain lion, a 10-mile radius around the Project site was evaluated. As described in the Draft EIR, current and probable future related projects within this 10-mile radius that might be developed or under construction within the same timeframe as the Project were identified (Meridian Consultants, 2021). In summary, these related projects are expected to develop approximately 13,422 single-family residential units, 11,462 multifamily residential units, 95 adult age-qualified residential units, and 7,446,000 square feet of commercial units. The majority of these projects are along the I-5 Castaic to Santa Clarita corridor near existing development in Castaic (High School), Hasley Canyon (residential), Newhall Ranch (residential and commercial), Val Verde (residential), and a plethora of small projects, infill, or an extension of the developed area. The largest of these projects is Newhall Ranch (see **Appendix B.1**).

As discussed with CDFW and the County, the application for Tract Map No. 62000 on property owned by the Project Applicant near the Project site has not been deemed complete, and that project is not currently being pursued. If and when Tract Map No. 62000 is pursued, it would be subject to the current stringent development standards, which would decrease the portion of this property available for development in comparison to Tract Map No. 62000 as originally proposed. Therefore, Tract Map No. 62000 is not considered a probable future project and is not in the cumulative analysis (see **Appendix B.1**).

Using the Dellinger et al. (2019) model, the habitat suitability for mountain lions in the vicinity was reviewed. The majority of current and future projects identified are in the area west of I-5. The I-5 is a barrier to mountain lion movement (Table 2). Essentially, development of the Project would not impact good-quality habitat for mountain lion; however, 14.23 acres (or 0.0009%) of moderate-quality habitat would be converted to residential uses in an area currently composed of an assortment of urban uses. The

Project would impact a higher percentage of poor-quality habitat, or 0.155% of the Project site. No good-quality mountain lion habitat would be impacted by development of the Project (see **Appendix B.1**).

Cumulatively, development of a 126.5-acre residential project near I-5, the Cities of Santa Clarita and Castaic, and the communities of Val Verde and Hasley Canyon, would reduce the amount of poor-quality habitat in an urban landscape not suited for mountain lion home range establishment or safe movement. However, due to the size and location of the Project site, the Project would have a cumulatively considerable contribution to a significant cumulative impact on mountain lion movement in the region (see **Appendix B.1**). The mitigation measure below is proposed to mitigate the contribution of the Project to this cumulative impact.

In formulating a mitigation measure that reflected the contribution of the Project to cumulative impacts on mountain lion movement, several factors were considered, including: the location of the site in relation to open space and developed areas, the habitat quality and quantity and movement potential on the Project site, the undeveloped natural lands remaining on Vesting Tentative Tract No. 60257, the proposed off-site conservation easement, and the proposed trail system.[1]

The Project will impact 101.3 acres of poor-quality mountain lion movement habitat per Dellinger et. al. (2019), Riley et. al. (2021), and Dudek (2021 and 2022). Since 12.6 acres of Natural Open Space along the boundary of the development will remain on the Project site, 37.9 acres of off-site land of similar habitat and movement potential will be placed in a Conservation Easement, and a 0.36-acre public trail will help retain a north-south connection for mountain lion movement through Chiquita Canyon; 50.4 acres of Project impacts would require mitigation for the Project's contribution to the cumulative impact.

All of the mitigation identified below in **MM 5.3-28** address areas with higher quality habitat located in areas more critical to successful mountain lion movement and genetics in the region. For this reason, a 1:2 mitigation (Mitigation: Impact) was determined to be appropriate. The mitigation options presented below were identified by the County based on consultation with Caltrans Senior District 7 Biologist Paul Caron and Jeff Sikich of the National Park Service. The following mitigation measure is incorporated into the Final EIR.

Mitigation Measure

MM 5.3-28 **Mountain Lion Movement.** Prior to issuance of a grading permit, to mitigate the contribution of the Project to a regional cumulative impact on mountain lion movement: (1) the subdivider shall establish a Conservation Easement over the 37.9-acre Off-Site Open Space Dedication Area and a Conservation Plan prepared and implemented to preserve coastal scrub habitat in the Off-Site Open Space Dedication Area and a 0.36-acre public

trail as illustrated on Vesting Tentative Tract Map No. 60257 shall be maintained in perpetuity to maintain movement opportunities for mountain lions between Chiquita Canyon and the Los Padres National Forest (please refer to MM 5.3-1); and (2) subdivider shall purchase an off-site conservation easement, to be held by a public agency or non-profit conservation planning organization, (a) covering at least 50 acres of equivalent habitat or (b) a smaller area if the following can be demonstrated: (i) within a known mountain lion corridor, or (ii) containing a riparian habitat and adjacent to a known mountain lion corridor, or (iii) within a known or modeled mountain lion movement corridor located in western Los Angeles County or eastern Ventura County, north of State Route-126 and south of the Los Padres National Forest. The conservation easement shall be recorded prior to grading permit issuance. The final size and location of the conservation easement shall be to the satisfaction of the director.

Comment 1-7:

Lastly, the Draft EIR does not address the anthropogenic impacts the Project will have on mountain lion individuals that may be within the Project site or its vicinity. The Project may increase human presence (e.g., new development, public trail access), traffic, and noise as well as potential artificial lighting during Project construction and over the life of the Project. Most factors affecting the ability of the southern California mountain lion populations to survive and reproduce are caused by humans (Yap et al. 2019). As California has continued to grow in human population and communities expand into wildland areas, there has been a commensurate increase in direct and indirect interaction between mountain lions and people (CDFW 2013). As a result, the need to relocate or humanely euthanize mountain lions (depredation kills) may increase for public safety. Mountain lions are exceptionally vulnerable to human disturbance (Lucas 2020). Areas of high human activity have lower occupancy of rare carnivores. Mountain lions tend to avoid roads and trials by the mere presence of those features, regardless of how much they are used (Lucas 2020). Increased traffic could cause vehicle strikes. As human population density increases, the probability of persistence of mountain lions decreases (Woodroffe 2000).

Response 1-7:

Indirect impacts of the Project from increasing human presence (e.g., new development, public trail access), traffic, noise, and artificial lighting on mountain lions will not be significant for the following reasons.

As discussed in Riley et al. (2021), the mountain lions studied were virtually never present in developed areas. Radio-tracked mountain lions retained mean distances from development that ranged from 1,280 meters (subadult males) to 1,930 meters (adult males) across the four age and sex classes (adult females, adult males, subadult females, subadult males). The distance between Hasley Canyon to the north and Val Verde to the south is roughly 1,500 meters. This existing development to the north and south reduces the suitability of the habitat on the Project site for mountain lions. Additionally, all age and sex classes of mountain lions avoided altered open areas, with males avoiding these areas most strongly. As discussed

in *Responses 1-5* and *1-6*, the Project site, while undeveloped, is surrounded by urban development and this is likely one of the reasons that no mountain lions were observed during Riley, et. al., 14-year study. Indirect impacts are further discussed below.

As detailed in Draft EIR Section 5.15: Transportation, mitigation measures are identified to avoid and minimize indirect impacts from improvements to the existing roads in the vicinity of the Project site. **MM 5.15-3** requires the incorporation of traffic-calming measures, such as marked crosswalks at appropriate locations, for on-site streets and intersections. Currently, the intersection of Del Valle Road and Hasley Canyon Road is controlled by one stop sign on northbound Del Valle Road merging onto Hasley Canyon Road. Roadways will be designed to lessen motor vehicle speeds and reduce traffic volume through the use of features that may include marked crosswalks, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, on-street parking, planter strips with street trees, chicanes/chokers, and others. The selection of specific traffic-calming treatments will occur as part of the roadway's final design process with a specific focus on reducing vehicular speed, resulting in safer conditions for residents and wildlife.

With the implementation of MM 5.15-4, the Project Developer will be required to pay applicable fees to the County to ensure that a fair-share contribution is made to the County for improvements at the time building permits are issued, including installation of a traffic signal at the intersection of Del Valle Road and Hasley Canyon Road. Additionally, through MM 5.15-9, the Project Developer will be required to pay applicable fees to the County/Caltrans to ensure that a fair-share contribution for a traffic signal at intersection of Chiquito Canyon Road and SR-126 (improvements identified in Caltrans SR-126 project study report). Installation of these signals will result in additional traffic controls that will reduce travel speeds and the potential hazards to residents and wildlife.

Noise from Project construction activities would be affected by the amount of construction equipment, the location of this equipment, the timing and duration of construction activities, and the relative distance to noise-sensitive receptors. Construction activities would generate both steady-state and episodic noise that would be heard both on and off the Project site. Each phase involves the use of different types of construction equipment and, therefore, has its own distinct noise characteristics. The Project would be constructed using typical construction techniques; no blasting or impact pile-driving would be required. As required by the County Noise Ordinance, the operation of Project-related construction equipment would be prohibited between hours of 7:00 PM and 7:00 AM and anytime on Sundays or legal holidays. The Draft EIR includes MM 5.11-1, which requires a construction noise monitoring plan ensuring that equipment is staged away from sensitive receptors, properly muffled, scheduled to avoid the operation of numerous pieces of heavy-duty off-road construction equipment simultaneously in close proximity, and

the use of temporary noise barriers, to reduce potentially significant noise impacts from Project construction.

Lighting can have well-documented indirect effects on wildlife, including the following: disorientation; avoidance of areas; disturbances of nighttime rest and sleep periods of diurnal birds; simulated increased day length, affecting reproductive cycles by triggering premature reproductive activity; and increased risk of predation. The Project would be developed to adhere to the County Rural Outdoor Lighting District Ordinance, which regulates outdoor lighting in the district to promote and maintain dark skies at night for residents and wildlife in the district. As required by the Rural Outdoor Lighting District Ordinance and the Castaic Area Community Standards District (CSD) regulations, the Project would include fewer streetlights than typical lighting associated with single-family homes and a small commercial center. Exterior lighting would be low intensity, directed towards the surface of on-site roadways and walkways, and/or fully shielded to prevent glare or direct illumination towards the nighttime sky or within the natural undisturbed open space area. Internal street lighting would only be permitted where required by the County Department of Public Works. The proposed commercial uses would include lighting that would be downcast luminaires with light patterns along the buildings to provide adequate illumination for safety. This would include that all lighting along the perimeter of natural areas is to be downcast luminaries with light patterns directed away from natural areas.

The Draft EIR includes MM 5.3-16 Lighting. “All lighting along the perimeter of natural areas shall be downcast luminaries with light patterns directed away from natural areas.” With implementation of the additional mitigation measures discussed above, this comment does not require further response or revisions to the Draft EIR.

As discussed in *Response 1-6* above, the Project site is situated adjacent to existing residential and industrial development on three sides that currently generates artificial outdoor residential and industrial lighting and noise. In addition, Del Valle Road is an existing road that bisects the Project site. In the Draft EIR, LACDRP acknowledges that although the Project is adjacent to existing development there is the potential for anthropogenic impacts on mountain lions. To address potential impacts to mountain lions from increased human presence, the following mitigation measures will be added into the Final EIR.

MM 5.3-23 **Pet Signage.** Prior to Project completion, the Project Applicant shall install signage requiring pets be kept on leash and on trails at all times. Signage shall also include information signage for hikers encouraging clean up after pets and discourage animal waste.

MM 5.3-24 **Wildlife Signage.** Prior to Project completion, the Project Applicant shall install appropriate public information signage in the residential area and along the trail to 1) educate and inform the public about wildlife, especially mountain lions, present in the area; 2) advise on proper avoidance measures to reduce human-wildlife conflicts; 3) advise on proper use of open space trails in a manner respectful to wildlife; and 4) provide local contact information to report injured or dead wildlife. Signage shall be written in the language(s) understandable to all those likely to recreate and use the trails. Signage shall not be made of materials harmful to wildlife such as spikes or glass. In addition, the Project Applicant shall prepare a long-term maintenance plan to repair and replace the signs.

The Draft EIR addresses potential impacts to the mountain lion, but no significant impacts are identified as described in *Responses 1-5*, *1-6*, and *1-7*, above, and in *Response 1-8* below.

Comment 1-8:

Evidence impact would be significant: The mountain lion is a specially protected mammal in the State (Fish and G. Code, § 4800). In addition, on April 21, 2020, the California Fish and Game Commission accepted a petition to list an evolutionarily significant unit of mountain lion in southern and central coastal California as threatened under CESA (CDFW 2020). As a CESA candidate species, the mountain lion in southern California is granted full protection of a threatened species under CESA. The Project may have significant impacts because no mitigation has been proposed for any unavoidable direct and indirect impacts from Project activities or subsequent residential development as well as permanent or temporal losses of habitat for mountain lion.

Response 1-8:

As discussed above in *Responses 1-5*, *1-6*, and *1-7*, the Project site contains low quality mountain lion habitat, is surrounded on three sides by urban development, and is outside known mountain lion territories and the Sierra Madre-Castaic Connection and Santa Monica-Sierra Madre Connection landscape linkages identified in the South Coast Missing Linkages Project (South Coast Wildlands 2008). Although there is potential for mountain lions to utilize the Project site, on occasion, development of the Project site would not result in significant impacts to the mountain lion or its habitat. Indirect impacts to mountain lions from noise and artificial lighting are addressed above in *Response 1-7*, including mitigation measures discussing noise, lighting, and signage.

As part of an ongoing study effort from 2002-2019, mountain lion home ranges as shown in the red and blue outlined areas in **Exhibit 5**, mountain lions have been captured and radio-tracked in the Los Padres National Forest, Santa Susana Mountains, Simi Hills, Santa Monica Mountains, Verdugo Mountains, and Griffith Park with funding and support from the National Park Service, University of California Los Angeles (UCLA), California State Parks, Santa Monica Mountains Fund, Santa Monica Mountains

Conservancy/Mountains Recreation and Conservation Authority, Calabasas Landfill, and UCLA La Kretz Center for California Conservation Science (Benson et al. 2020).[2] As shown in **Exhibit 5**, the Project site (pink star) is outside mountain lion home ranges which further supports that the Project site is not within key mountain lion habitat.

The National Park Service provides a collection of maps, graphics, and other imagery related to mountain lions on the internet website flickr. As shown in **Exhibit 6**, radiotracking of mountain lion P16 indicates that it has been documented to have part of his home range (red polygons in **Exhibit 6**) approximately 1.5 miles (8,000 feet) to the north/northwest and south of the Project site (pink star); however, it utilized open spaces far to the west through the Los Padres National Forest and Santa Susana Mountains and areas south and along SR-126 to disperse (dispersal path, red dashed line in **Exhibit 6**) between the home range north of the Project site to the home range south of the Project site (flickr 2022).

In 2016, National Park Service documented mountain lion home ranges via radiotracking GPS locations. As shown in **Exhibit 7**, radiotracking of male mountain lion P38 indicates that it is known to have a home range (light brown polygon in **Exhibit 7**) north, west, and south of the Project site (pink star) including areas south of SR-126 (flickr 2022).

A mountain lion study which included radio-tracking from 2002-2016 was released in late 2021 further identifying the mountain lion home ranges (Riley et al. 2021). As shown in **Exhibit 1**, radiotracking of male mountain lion P38 indicates that it is known to have a home range north, west, and south of the Project site (pink star) including areas south of SR-126 (Riley et al. 2021).[3]

2 Benson et al. (Benson, John F., Jeff. A. Sikich, and Seth P. D. Riley). 2020. Survival and competing mortality risks of mountain lions in a major metropolitan area. Papers in Natural Resources. 1367. https://digitalcommons.unl.edu/natrespapers/1367

3 Riley et al. (Riley, S. P. D., J. A. Sikich, and J. F. Benson). 2021. Big Cats in the big city: Spatial ecology of mountain lions in greater Los Angeles. Journal of Wildlife Management 85:1527-1542.

Exhibit 5. Mountain lion composite home ranges (red and blue outlined areas) (Benson et al. 2020) and Project site (pink star)

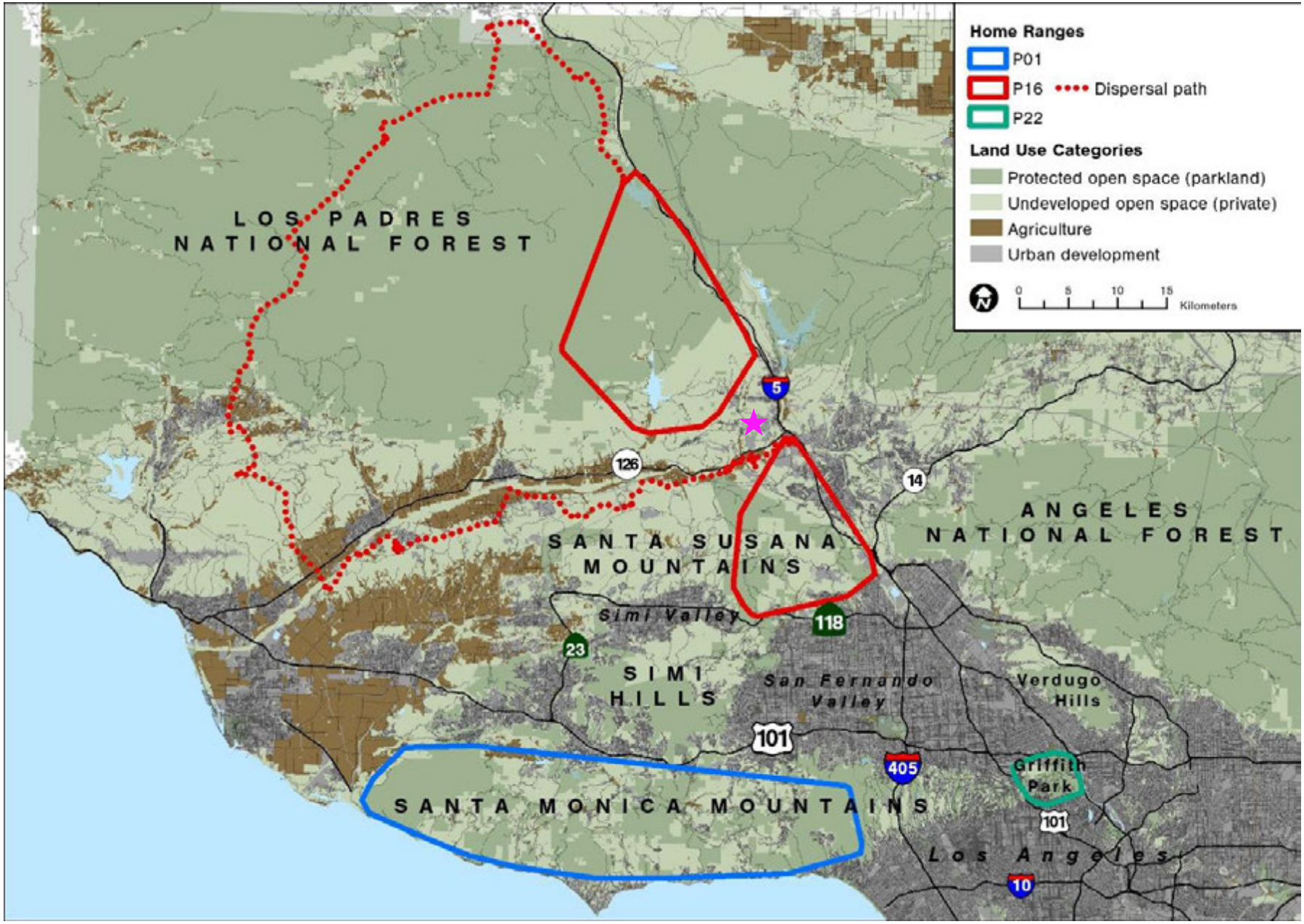

Exhibit 6. Mountain lion home ranges and dispersal paths (flickr 2022) and Project site (pink star).

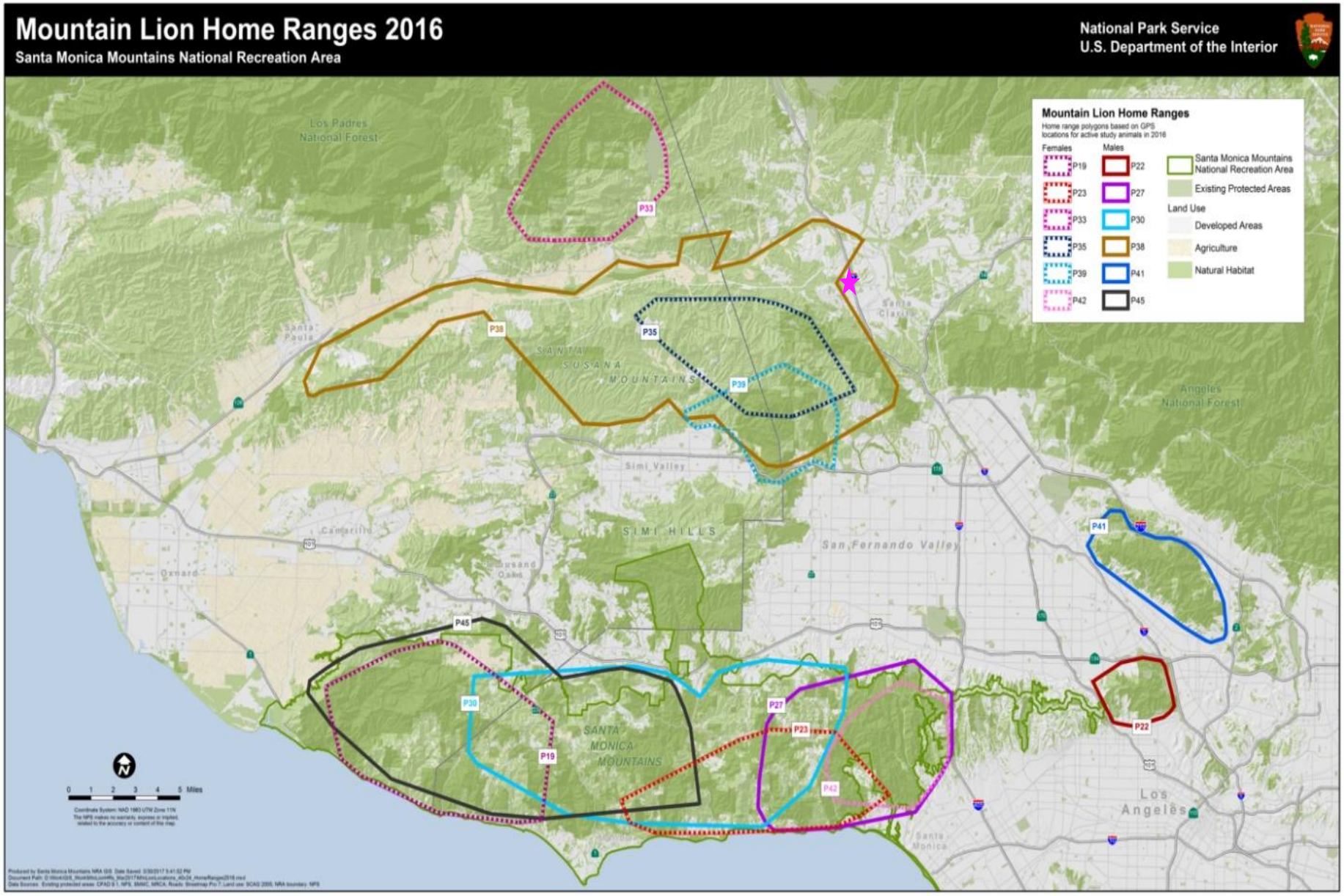

Exhibit 7. Mountain lion home ranges 2016. (flicker 2022)

As discussed in the Draft EIR and further explained above, due to the existing adjacent residential and industrial development near the Project site, associated existing anthropogenic disturbances, and limited food prey sources, the Project site does not contain high habitat value for mountain lions. Additionally, radiotracking data documents that mountain lion home ranges and dispersal paths have not been detected on the Project site but approximately 1.5 miles north, west, and south of the Project site through open landscapes in the Los Padres National Forest and Santa Susana Mountains.

Consistent with CEQA Guidelines Appendix G, the following thresholds are used to determine the potential for the Project to result in a significant impact on mountain lions.

Threshold 1: **Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?**

Threshold 4: **Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

Threshold 1 Discussion: As documented in the Draft EIR and discussed in the previous responses to the comments in this letter, mountain lions have not been observed on the Project site during multiple radio-tracking studies (Benson et al. 2020, flickr 2022, Riley et al. 2021) or during Project surveys, but have the potential to be present and/or move through the Project site based on the habitat and presence of their primary prey item, mule deer.[4,5,6] The Project site is surrounded by residential and industrial development on three sides and does not contain high quality habitat for mountain lion use. Due to the potential temporary presence of mountain lions, their mobile nature, and abundant suitable habitat present in the Los Angeles County Santa Clara River SEA and Santa Felicia SEA, the South Coast Missing Linkages Sierra Madre–Castaic Connection and Santa Monica–Sierra Madre Connection, and the California Essential Habitat Connectivity Project Essential Connectivity Areas to the northwest, west, and southwest of the Project site, approval of the Project and development of the Project site will not result in a substantial adverse effect through direct species mortality.

4 Benson et al. (Benson, John F., Jeff. A. Sikich, and Seth P. D. Riley). 2020. Survival and competing mortality risks of mountain lions in a major metropolitan area. Papers in Natural Resources. 1367. https://digitalcommons.unl.edu/natrespapers/1367

5 flicker. 2022. https://www.flickr.com/photos/santamonicamtns/albums/72157673424284068. Accessed January 2022.

6 Riley et al. (Riley, S. P. D., J. A. Sikich, and J. F. Benson). 2021. Big Cats in the big city: Spatial ecology of mountain lions in greater Los Angeles. Journal of Wildlife Management 85:1527-1542.

Additionally, as discussed in Riley et al. (2021), which radio-tracked mountain lions in Los Angeles and Ventura counties from 2002 through 2016, overall mountain lion use of urban areas was very low and shrub vegetation types, especially chaparral, were identified as important in terms of mountain lion habitat use and resource selection.[7] More specifically, the radio-tracked mountain lions consistently selected native vegetation types with dense cover: chaparral, riparian woodland, and coastal sage scrub. The Project site contains chaparral and coastal scrub vegetation communities which comprise slightly more than one third of the Project area; however, this vegetation is interspersed with open areas of grass and herb-dominated areas decreasing the continuity of these key coastal scrub and chaparral vegetation communities. Additionally, in general, the chaparral and coastal scrub vegetation communities on the Project site have a relatively short canopy height and are located on slopes. As mentioned in Riley et al. (2021), adult mountain lions avoided steep slopes, especially adult females and mountain lions select areas with dense stalking cover and avoid open areas to facilitate hunting success. Due to the lack of high-quality mountain lion suitable habitat within the Project site, lack of radio-tracked mountain lions within the Project area, adjacency to existing development, and large areas of abundant suitable habitat present in the Los Angeles County Santa Clara River SEA and Santa Felicia SEA, the South Coast Missing Linkages Sierra Madre–Castaic Connection and Santa Monica–Sierra Madre Connection, and the California Essential Habitat Connectivity Project Essential Connectivity Areas to the northwest, west, and southwest of the Project site, the Project will not result in a substantial adverse effect from habitat modification.

To address potential impacts to mountain lions through the use on the Project site of second-generation anticoagulant rodenticide, the Project will prohibit use of this class of rodenticides. The Draft EIR includes **MM 5.3-14 Homeowner Association Covenants, Conditions, and Restrictions,** which includes requirements to reduce potential human impacts on adjacent habitats and wildlife species. At the request of CDFW, **MM 5.3-14 Homeowner Association Covenants, Conditions, and Restrictions** has been revised as follows:

MM 5.3-14 **Homeowner Association Covenants, Conditions, and Restrictions.** Prior to the issuance of grading permits, the Project Developer shall submit the homeowner association (HOA) Covenants, Conditions, and Restrictions to the County of Los Angeles Department of Regional Planning for review and approval. The homeowner association Covenants, Conditions, and Restrictions shall include the following requirements to reduce potential human impacts on adjacent habitats and wildlife species:

7 Riley et al. (Riley, S. P. D., J. A. Sikich, and J. F. Benson). 2021. Big Cats in the big city: Spatial ecology of mountain lions in greater Los Angeles. Journal of Wildlife Management 85:1527-1542.

- All dogs and cats shall be in compliance with requirements found in Sections 10.20.150 through 10.20.350 of the Los Angeles County Code related to appropriate licensing and tagging, leashed animals when appropriate, ensuring that all dogs and cats are neutered or spayed (or an unaltered license in accordance with Los Angeles County Code), and that all dogs and cats have a microchip.
- Smoking shall be prohibited in open space areas.
- Speed limits shall be posted, and the Covenants, Conditions, and Restrictions shall require residents to comply with the posted speed limits.
- Balloons shall not be utilized by the homeowner association for any community events and the use of balloons by individual homeowners shall be discouraged.
- Homeowner reprisals against native wildlife species (i.e., killing or harming native wildlife species in any way) if homeowner pets are killed or harmed by wildlife shall be prohibited.
- Second-generation anticoagulant rodenticide use shall be prohibited.

As discussed above and detailed in Draft EIR Section 5.15: Transportation, mitigation measures are identified to avoid and minimize transportation impacts. **MM 5.15-3** requires the incorporation of traffic-calming measures such as marked crosswalks at appropriate locations for on-site streets and intersections. Currently, at the intersection of Del Valle Road and Hasley Canyon Road, there is one stop sign on northbound Del Valle Road merging into Hasley Canyon Road. Roadways will be designed to lessen motor vehicle speeds and reduce traffic volume through the use of features that may include marked crosswalks, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, on-street parking, planter strips with street trees, chicanes/chokers, and others. The selection of specific traffic-calming treatments will occur as part of the roadway's final design process with a specific focus on reducing vehicular speed, resulting in safer conditions for residents and wildlife.

With the implementation of MM 5.15-4, the Project Developer will pay applicable fees to the County to ensure that a fair-share contribution is made to the County for improvements at the time building permits are issued including installation of a traffic signal at the intersection of Del Valle Road and Hasley Canyon Road. Additionally, through MM 5.15-9**,** the Project Developer will pay applicable fees to the County/Caltrans to ensure that a fair-share contribution is made for a traffic signal at Chiquito Canyon Road and SR-126 (improvements identified in Caltrans SR-126 project study report).

The current design of Del Valle Road includes sharp increases in topographical elevation and limited visibility along the Vesting Tentative Tract Map (VTTM) site. Through implementation of the Project, Del Valle Road would continue to provide one lane in each direction; however, Del Valle Road would be widened to approximately 64 feet within approximately 80 feet of right-of-way to meet current County standards for a Limited Secondary Highway, increasing the visibility and safety of this public road. Road improvements include lowering the hill, increasing visibility on the road and adjacent areas. Upon completion, the additional right-of-way would provide for increased vehicular movement during an

emergency and would provide for additional surface area to potentially incorporate drainage control features. Internal roadways would be designed for one lane in each direction within approximately 58 feet of right-of-way. A bus stop would be relocated but continue to be provided along Del Valle Road.

Threshold 4 Discussion: As documented in the Draft EIR and discussed in the previous responses to the comments in this letter, from a regional perspective, the community of Val Verde constrains access to available habitat to the south and southwest of the Project site, which constitutes some level of impediment to habitat connectivity. However, the open space to the west of the Project site already provides important wildlife movement corridors. The existing residential communities of Val Verde, Castaic, and Hasley Canyon and the industrial park to the east of the Project site limit movement through the Project site. There are significant wildlife linkages in the region, including the Sierra Madre–Castaic Connection, which connect the Los Padres National Forest and Angeles National Forest, and the Santa Monica–Sierra Madre Connection, which stretches from the Santa Monica Mountains to the peaks of the Santa Susana Mountains and the Sierra Madres Ranges of the Los Padres National Forest (South Coast Wildlands 2008). Additionally, there are years of mountain lion radiotracking GPS data (Benson et al. 2020, flicker 2022, Riley et al. 2021) that document mountain lion use north, west, and south of the Project site, but not on the Project site. [8,9,10] Due to the existing development adjacent to the Project site which already constrains wildlife movement and the significant open space west of the Project site in the Los Padres National Forest, approval and implementation of the Project will not interfere substantially with mountain lion movement or migratory wildlife corridors or use of native wildlife nursery sites.

Comment 1-9:

Recommendation: CDFW recommends LACDRP evaluate the mountain lion territory size and use of habitat within and surrounding the Project vicinity. LACDRP should analyze the effects of increased human presence and area of anthropogenic influence that will now be in on *[sic]* mountain lion habitat, and how it may impact mountain lion behavior, reproductive viability, and overall survival success. Based on these known anthropogenic impacts on mountain lions, CDFW also recommends LACDRP provide compensatory mitigation for impacts to mountain lion. The Draft EIR should justify how the proposed compensatory mitigation would reduce the impacts of the Project to less than significant. CDFW recommends that the LACDRP recirculate the Draft EIR for more meaningful public review and assessment of the LACDRP's analysis and subsequent mitigation for mountain lion. Additionally, the LACDRP should recirculate the

8 Benson et al. (Benson, John F., Jeff. A. Sikich, and Seth P. D. Riley). 2020. Survival and competing mortality risks of mountain lions in a major metropolitan area. Papers in Natural Resources. 1367. https://digitalcommons.unl.edu/natrespapers/1367.

9 flicker. 2022. https://www.flickr.com/photos/santamonicamtns/albums/72157673424284068. Accessed January 2022.

10 Riley et al. (Riley, S. P. D., J. A. Sikich, and J. F. Benson). 2021. Big Cats in the big city: Spatial ecology of mountain lions in greater Los Angeles. Journal of Wildlife Management 85:1527-1542.

Draft EIR if the proposed mitigation measures would not reduce potential effects to less than significant and new measures must be required [CEQA Guidelines, § 15088.5(a)(1)].

Response 1-9:

Information is provided on mountain lion home range and use of habitat within and surrounding the Project vicinity in *Responses 1-5* through *1-8*. As the information from multi-year radio collar tracking studies and habitat suitability models (Dellinger et. al. 2019) provide sufficient information to determine the value of the habitat on the Project site for mountain lions and the relationship of the Project site to identified home territories for mountain lions in the area, additional studies are not necessary. As discussed in *Responses 1-5* to *1-8*, approval and implementation will not result in the loss of any habitat that is an important part of the territory of mountain lions in the area and for this reason, the loss of the habitat on the site will not result in significant impacts to mountain lions and, for this reason, no compensatory mitigation is necessary (see **Appendix B.1**)

Mitigation measures related to human presence implemented to reduce potential anthropogenic impacts have been incorporated into the EIR including: **MM 5.3-14 Homeowner Association Covenants, Conditions, and Restrictions**, MM 5.3-16 Lighting, **MM 5.3-23 Pet Signage**, **MM 5.3-24 Wildlife Signage**, MM 5.11-1 construction noise mitigation measures, **MM 5.15-3** traffic-calming measures, MM 5.15-4 pay fees towards installation of a traffic signal at the intersection of Del Valle Road and Hasley Canyon, and MM 5.15-9 pay fees towards installation of a traffic signal at intersection of Chiquito Canyon Road and SR-126. The Draft EIR and the responses above provide an extensive analysis of wildlife movement and wildlife corridors and no significant new information has been added to the EIR; therefore, recirculation of the Draft EIR is not required.

Comment 1-10:

Mitigation Measure #1: In addition to the 37.9 acres in the Open Space Dedication Area, CDFW recommends setting aside a minimum of additional 88.6 acres of replacement habitat to have a no net loss of 126.5 acres for wildlife movement. CDFW recommends the replacement habitat be located as near to the Project site as possible. There should be no net loss of suitable habitat for mountain lions. LACDRP should consult and collaborate with CDFW to conserve areas beneficial to the southern California mountain lion population that may improve chances of survival and reproduction of mountain lions in the face of climate change. The mitigation lands should be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity that has been approved to hold and manage mitigation lands pursuant to Assembly Bill 1094 (2012). Assembly Bill 1094 amended Government Code sections 65965-65968. Under Government Code section 6596I), the lead agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves. An appropriate non-wasting endowment should be provided for the long-term management of mitigation lands. A conservation easement and endowment funds should be fully acquired, established,

transferred, or otherwise executed prior to implementing Project-related ground-disturbing activities and prior to LACDRP's issuance of grading permits.

Response 1-10:

As described in the Draft EIR and in *Responses 1-5* through *1-9*, from a regional perspective, the community of Val Verde constrains access to available habitat to the south and southwest of the Project site, which constitutes some level of impediment to habitat connectivity. However, the open space to the northwest of the Project site provides important wildlife movement corridors for wildlife. The existing residential communities of Val Verde, Castaic, and Hasley Canyon and the industrial park limit movement through the Project site. There are significant wildlife linkages, including the Sierra Madre–Castaic Connection, which connects the Los Padres National Forest and Angeles National Forest, and the Santa Monica–Sierra Madre Connection, which stretches from the Santa Monica Mountains to the peaks of the Santa Susana Mountains and the Sierra Madres Ranges of the Los Padres National Forest (South Coast Wildlands 2008). Additionally, there are years of mountain lion radiotracking GPS data that document mountain lion use north, west, and south of the Project site, not including the Project site. This information supports the conclusion in the Draft EIR that the Project is not part of a wildlife movement corridor for mountain lions and for this reason, approval and implementation of the Project will not result in significant impacts to mountain lion movement. Accordingly, the mitigation suggested in this comment is not warranted or necessary.

As discussed in Riley et al. (2021), which radio-tracked mountain lions in Los Angeles and Ventura counties from 2002 through 2016, the mountain lions were virtually never in developed areas. Radio-tracked mountain lions had mean distances to development that ranged from 1,280 meters (subadult males) to 1,930 meters (adult males) across the four age and sex classes (adult females, adult males, subadult females, subadult males). Additionally, all age and sex classes avoided altered open areas, with males avoiding these areas the most strongly.

Additionally, Riley et al. (2021) found that overall mountain lion use of urban areas was very low and shrub vegetation types, especially chaparral, were identified as important in terms of mountain lion habitat use and resource selection. More specifically, the radio-tracked mountain lions consistently selected native vegetation types with dense cover: chaparral, riparian woodland, and coastal sage scrub. The Project site does contain coastal scrub and chaparral vegetation communities which comprise slightly more than one third of the Project area; however, this vegetation is interspersed with open areas of grass and herb dominated vegetation communities and disturbed and developed lands. The coastal scrub and chaparral on the Project site occur in patchy areas within regularly maintained dirt roads and open grass and herb dominated areas decreasing the continuity of these key coastal scrub and chaparral vegetation communities. Additionally, in general the coastal scrub and chaparral vegetation communities on the

Project site have a relatively short canopy height and are located on slopes. As mentioned in "Big Cats in the Big City: Spatial Ecology of Mountain Lions in Greater Los Angeles" (Riley et al. 2021), adult mountain lions avoided steep slopes, especially adult females, and mountain lions select areas with dense stalking cover and avoid open areas to facilitate hunting success.[11] Due to the lack of high-quality mountain lion suitable habitat within the Project site, lack of radio-tracked mountain lions within the Project area, adjacency to existing development, and large areas of abundant suitable habitat present in the Los Angeles County Santa Clara River SEA and Santa Felicia SEA, the South Coast Missing Linkages Sierra Madre–Castaic Connection and Santa Monica–Sierra Madre Connection, and the California Essential Habitat Connectivity Project Essential Connectivity Areas to the northwest, west, and southwest of the Project site, the Project is not anticipated to interfere substantially with mountain lion movement or migratory wildlife corridors or use of native wildlife nursery sites and therefore habitat mitigation for wildlife movement is not required.

The project would not result in a net loss of quality mountain lion habitat, nor has use of the Project site by mountain lions been documented in the last 20 years; therefore, no compensatory mitigation for mountain habitat loss is required.

Comment 1-11:

Mitigation Measure #2: Due to habitat in the Project vicinity, within one year prior to Project implementation that includes site preparation, equipment staging, and mobilization, a CDFW approved biologist knowledgeable of mountain lion species ecology should survey areas that may provide habitat for mountain lion to determine presence/absence, territory size, and potential for natal dens within a half mile of the Project site. Caves and other natural cavities, and thickets in brush and timber provide cover and are used for denning. Females may be in estrus at any time of the year, but in California, most births probably occur in spring. Surveys should be conducted when the species is most likely to be detected, during crepuscular periods at dawn and dusk (Pierce and Bleich 2003). Survey results including negative findings should be submitted to CDFW prior to initiation of Project activities. The survey report should include a map of potential denning sites. The survey report should include measures to avoid impacts mountain lions that may be in the area as well as dens and cubs, if necessary.

Response 1-11:

It is extremely rare for an experienced mountain lion biologist to observe a mountain lion in the wild without signals from a GPS collar and, even then, locating the lion is challenging as they are often hidden within dense brush (Jeff Sikich, National Park Service, personal communication). Due to the secretive nature of the mountain lion and lack of access to nearby properties within a half mile of the project site,

11 Riley et al. (Riley, S. P. D., J. A. Sikich, and J. F. Benson). 2021. Big Cats in the big city: Spatial ecology of mountain lions in greater Los Angeles. Journal of Wildlife Management 85:1527-1542.

the Applicant will use strategically placed, non-invasive remote wildlife cameras to detect the presence or absence of mountain lions within the VTTM site prior to the initiation of construction of the Project.

Determining territory size for any mountain lion potentially using the Project Site is not feasible, since it is much smaller than the home range of any individual mountain lion, and therefore would represent only a small portion of any mountain lions possibly using the site. In a recent paper (Riley Et. al. 2021), mountain lion experts from the Santa Monica Mountains Natural Recreation Area utilized 14 years of GPS-collar data to estimate the home range size for mountain lions in Los Angeles and Ventura Counties. Home ranges averaged 372 km^2 (91,923.2 acres) for adult males and 134 km^2 (33,112.1 acres) for adult females, which is consistent with other studies (Riley Et. al. 2021). If a mountain lion were to establish part of its territory on the Project site, it would be only a small percentage of the territory (i.e., 0.12% of the average home range for a male and 0.34% of the average home range for a female, respectively); therefore, establishing a territory or territories for a mountain lion on-site is not feasible.

Natal dens are more difficult to locate than individual mountain lions as they are hidden deep within dense shrub habitat, rock piles, caves, etc. (Note rock piles and caves are absent from the Project site). Wildlife cameras may photograph a pregnant or lactating female mountain passing by, which would indicate a natal den is nearby, but finding the natal den would likely be infeasible.

MM 5.3-25 **Mountain Lion Avoidance**. Fourteen weeks (i.e., approximately one season) prior to Project implementation (including site preparation, equipment staging, and mobilization) strategically placed, non-invasive remote wildlife cameras shall be deployed within the VTTM site to detect the presence/absence of mountain lions. The wildlife cameras shall be downloaded, and photographs reviewed weekly for 12-weeks until 2-weeks before groundbreaking activities commence. Additionally, the Applicant's biologist shall review any recent and publicly available mountain lion observations in the area from agency and scientific sources (i.e., CDFW, Santa Monica National Recreation Area, etc.). A report documenting the results of the camera survey, including negative findings, shall be submitted to the County and CDFW prior to initiation of Project activities. The survey report shall include measures to avoid impacts to mountain lions that may be in the area, as well as to dens and cubs, if needed, depending on the results of the camera survey. If a pregnant or lactating (i.e., engorged teats) female mountain lion is observed in the survey, CDFW will be notified and a buffer extending 2000 ft. (or to the limits of the property project parcels) will be applied from the location of the camera station, which would be assumed to be near the natal den. No work shall occur within the 2,000-foot buffer until mountain lion cubs have been successfully reared; the mountain lions have left the area; or as determined in consultation with CDFW.

Comment 1-12:

Mitigation Measure #3: If potential habitat for natal dens is identified, CDFW recommends fully avoiding potential impacts to mountain lions, especially during spring, to protect vulnerable cubs. Two weeks prior to Project implementation, and once a week during construction activities, a CDFW-approved biologist should conduct a survey for mountain lion natal dens. The survey area should include the construction footprint and the area within 2,000 feet (or the limits of the property line) of the Project disturbance boundaries. CDFW should be notified within 24 hours upon location of a natal den. If an active natal den is located, during construction activities, all work should cease. No work should occur within a 2,000-foot buffer from a natal den. A qualified biologist should notify CDFW to determine the appropriate course of action. CDFW should also be consulted to determine an appropriate setback from the natal den that would not adversely affect the successful rearing of the cubs. No construction activities or human intrusion should occur within the established setback until mountain lion cubs have been successfully reared; the mountain lions have left the area; or as determined in consultation with CDFW.

Response 1-12:

Please see *Response 1-11*.

Please refer to *Response 1-11* and **MM 5.3-25**.

Comment 1-13:

Mitigation Measure #4: If "take" or adverse impacts to mountain lion cannot be avoided either during Project construction and over the life of the Project, LACDRP should consult CDFW and must acquire a CESA Incidental Take Permit (pursuant to Fish & Game Code, § 2080 *et seq*.).

Response 1-13:

As discussed in prior responses, no take of an individual mountain lion is expected nor would implementation of the Project result in significant impacts to high quality mountain lion habitat. Please refer to *Responses to Comments 1-5* through *1-10*, above.

Comment 1-14:

Mitigation Measure #5: CDFW recommends LACDRP require the Project Applicant to install appropriate public information signage in the residential area and along the trail to: 1) educate and inform the public about wildlife, especially mountain lions, present in the area; 2) advise on proper avoidance measures to reduce human-wildlife conflicts; 3) advise on proper use of open space trails in a manner respectful to wildlife; and 4) provide local contact information to report injured or dead wildlife. Signage should be written in the language(s) understandable to all those likely to recreate and use the trails. Signage should not be made of materials harmful to wildlife such as spikes or glass. LACDRP should require the Project Application to provide a long-term maintenance plan to repair and replace the signs.

Response 1-14:

MM 5.3-24 Wildlife Signage will be added into the Final EIR, as detailed in *Response 1-7* above.

Comment 1-15:

Mitigation Measure #6: CDFW recommends LACDRP require the Project Applicant to place restrictions on types of activities allowed in some areas, such as prohibiting dogs or restricting use of trails near breeding habitat, to aid in minimizing disturbance. Pets should be kept on leash and on trails at all times. Hikers should be encouraged to clean up after their dogs and discourage animal waste as it tends to lead to wildlife avoidance.

Response 1-15:

MM 5.3-23 Pet Signage will be added into the Final EIR**,** as detailed in *Response 1-7* above.

Comment 1-16:

Mitigation Measure #7: Trash receptacles should be placed in areas to avoid creating an unnatural food source that may attract nuisance wildlife and to minimize waste in core habitat areas.

Response 1-16:

The Draft EIR includes included MM 5.3-15 Trash Receptacles. "Trash and garbage shall be controlled in areas adjacent to development with waste and recycling receptacles that discourage wildlife foraging in common areas/parks." This comment does not require further response or revisions to the Draft EIR. MM 5.3-15 Trash Receptacles is consistent with the recommendation in this comment.

Comment 1-17:

Mitigation Measure #8: The Project Applicant shall prohibit the use of second-generation anticoagulant rodenticide.

Response 1-17:

The Draft EIR included **MM 5.3-14 Homeowner Association Covenants, Conditions, and Restrictions,** which includes requirements to reduce potential human impacts on adjacent habitats and wildlife species. **MM 5.3-14 Homeowner Association Covenants, Conditions, and Restrictions** has been revised to incorporate the recommendation in this comment:

MM 5.3-14 **Homeowner Association Covenants, Conditions, and Restrictions.** Prior to the issuance of grading permits, the Project Developer shall submit the homeowner association (HOA) Covenants, Conditions, and Restrictions to the County of Los Angeles Department of Regional Planning for review and approval. The homeowner association Covenants, Conditions, and Restrictions shall include the following requirements to reduce potential human impacts on adjacent habitats and wildlife species:

- All dogs and cats shall be in compliance with requirements found in Sections 10.20.150 through 10.20.350 of the Los Angeles County Code related to appropriate

licensing and tagging, leashed animals when appropriate, ensuring that all dogs and cats are neutered or spayed (or an unaltered license in accordance with Los Angeles County Code), and that all dogs and cats have a microchip.

- Smoking shall be prohibited in open space areas.
- Speed limits shall be posted, and the Covenants, Conditions, and Restrictions shall require residents to comply with the posted speed limits.
- Balloons shall not be utilized by the homeowner association for any community events and the use of balloons by individual homeowners shall be discouraged.
- Homeowner reprisals against native wildlife species (i.e., killing or harming native wildlife species in any way) if homeowner pets are killed or harmed by wildlife shall be prohibited.
- <u>Second-generation anticoagulant rodenticide use shall be prohibited.</u>

Comment 1-18:

Specific impacts: The Project may result in reduced reproductive capacity, population declines, or local extirpation of an SSC. In addition, permanent loss of foraging, breeding, nesting, or nursery habitat for an SSC may occur.

Why impacts would occur: According to Table 5.3-8, the Project site has the potential to support SSC, which includes burrowing owl (*Athene cunicularia*), Vaux's swift (*Chaetura vauxi*), loggerhead shrike (*Lanius ludovicianus*), coastal California gnatcatcher (*Polioptila californica*), California legless lizard (*Anniella spp*.), San Diegan tiger whiptail (*Aspidoscelis tigris stejnegeri*), Blainville's horned lizard (*Phrynosoma blainvillii*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), San Diego desert woodrat (*Neotoma lepida intermedia*), and American badger (*Taxidea taxus*). Impacts to an SSC could result from increased anthropogenic presence which includes increased noise disturbances, light disturbances, human activity, and dust.

Response 1-18:

The Draft EIR included MM 5.11-1, which includes development of a Construction Noise Reduction Plan to minimize construction noise at nearby noise sensitive receptors. The Draft EIR included MM 5.3-16 Lighting. "All lighting along the perimeter of natural areas shall be downcast luminaries with light patterns directed away from natural areas." The Draft EIR included MM 5.2-2, which includes additional dust suppression measures during Project construction, in the form of more frequent water dust suppression and other control measures that are beyond the South Coast Air Quality Management District Dust Control Plan requirements. The Draft EIR included MM 5.3-8 Reptile Pre-construction Survey and Relocation, which includes, within thirty days prior to ground-disturbance activities associated with construction or grading activities for the Project, a survey of suitable habitat to capture and relocate California legless lizard, Blainville's horned lizard, and San Diegan tiger whiptail individuals. The Species of Special Concern

(SSC) with potential to occur on the Project site are known to occur within a wide geographic region, and development of the Project site would not cause a significant decline in the loss of foraging, breeding, nesting, or nursery habitat that would result in significant population declines. The establishment of the Off-Site Open Space Area conservation easement, MM 5.3-1 Conservation Easement, preserves adjacent natural habitats that can be used by special-status wildlife species. Vegetation alliances within the Off-Site Open Space Area conservation easement include California sagebrush–California buckwheat scrub (*Artemisia californica–Eriogonum fasciculatum*) Alliance, California sagebrush scrub (*Artemisia californica*) Alliance, Palmer's goldenbush scrub (*Ericameria palmeri*) Provisional Alliance, Purple sage scrub (*Salvia leucophylla*) Alliance, Wild oats and annual brome grasslands (*Avena* spp.–*Bromus* spp.) Semi-Natural Alliance, disturbed habitat, and developed areas, which are also present within the Project site and are known to support SSC throughout the southern California region. Additionally, mitigation measures MM 5.3-7 Biological Monitoring, MM 5.3-8 Reptile Pre-construction Survey and Relocation, **MM 5.3-9 Pre-construction Nesting Bird Survey**, MM 5.3-10 Pre-construction Burrowing Owl Survey, MM 5.3-11 Pre-construction Surveys for San Diego Black-Tailed Jackrabbit, MM 5.3-12 Pre-construction Survey for American Badger, MM 5.3-13 Pre-construction Surveys for San Diego Desert Woodrat, **MM 5.3-14 Homeowner Association Covenants, Conditions, and Restrictions,** MM 5.3-15 Trash Receptacles, and MM 5.3-16 Lighting will reduce impacts to special-status wildlife species to less than significant.

Comment 1-19:

The mitigation measures in the Draft EIR for SSC attempts to prevent direct injury or mortality (trampling, crushing) of individuals that are discovered during surveys. However, there is no mitigation for the loss of occupied SSC habitat. Typical compensatory mitigation includes the purchase of land consisting of suitable habitat and/or individuals of the impacted species. While the Open Space Dedication Area will have a conservation easement to offset impacts to vegetation communities, it is unclear if there is appropriate habitat there for SSC. Therefore, it is unclear how the mitigation strategy would reduce impacts to SSCs, including the loss of occupied SSC habitat, to less than significant.

Response 1-19:

The SSC with potential to occur on the Project site are known to occur within a wide geographic region and development of the Project would not cause a significant decline in the loss of foraging, breeding, nesting, or nursery habitat that would result in significant population declines. The establishment of the Off-Site Open Space Area conservation easement, MM 5.3-1 Conservation Easement, preserves adjacent natural habitats suitable for these SSC.

Vegetation alliances and associations within the Off-Site Open Space Area conservation easement include California sagebrush–California buckwheat scrub (*Artemisia californica–Eriogonum fasciculatum*) Alliance, California sagebrush scrub (*Artemisia californica*) Alliance, Palmer's goldenbush scrub (*Ericameria palmeri*)

Provisional Alliance, Purple sage scrub (*Salvia leucophylla*) Alliance, Wild oats and annual brome grasslands (*Avena* spp.–*Bromus* spp.) Semi-Natural Alliance, disturbed habitat, and developed areas, which are also present within the Project site and are known to support SSC throughout the southern California region. Establishment of the Off-Site Open Space Area conservation easement, MM 5.3-1 Conservation Easement, would preserve 37.9 acres of vegetation habitats supporting SSC, resulting in a 0.3:1 preservation ratio (preservation acres: impacted acres). The 37.9 acres of Off-Site Open Space Area conservation easement is comprised of 33.3 acres of native scrub, while the impact areas are comprised of 44.8 acres of native woodland, riparian, chaparral, and scrub vegetation, resulting in 0.7:1 preservation ratio of native vegetation habitats (preservation acres: impacted acres).

The relative quality of the vegetation habitats at the Off-Site Open Space Area conservation easement is high based on the amount and diversity of native scrub cover, minimal anthropogenic disturbances within and directly adjacent, contiguous undeveloped habitat adjacent including the 41.3-acre conservation easement subject to preservation in perpetuity held by Mountains Recreation and Conservation Authority adjacent to the east of the 37.9-acre Off-Site Open Space Area conservation easement. Additionally, the Project Applicant and landowner has dedicated a 20-foot-wide trail easement through the 16.1-acre Tentative Tract (TR062000) adjacent to the north of the 37.9-acre Off-Site Open Space Area conservation easement. The vegetation habitats within the impact area are of a lower quality due to the current presence of routinely graded dirt roads, a single-family residence, concrete pad/slab on the southern portion of the VTTM site, and the pad associated with past oil well drilling and operations. These disturbances and development, in addition to the fragmented nature of the native vegetation habitats result in a relative lower quality of habitat. Due to the relative higher quality of the vegetation habitats at the Off-Site Open Space Area conservation easement, minimal anthropogenic disturbances, and contiguous undeveloped habitat adjacent it is more likely that SSC would be present within the Off-Site Open Space Area conservation easement.

The relative higher quality of vegetation habitats at the Off-Site Open Space Area conservation easement, including minimal anthropogenic disturbances and contiguous undeveloped habitat adjacent to the impact areas, and the amount and diversity of vegetation habitat preserved through establishment of the Off-Site Open Space Area conservation easement, MM 5.3-1 Conservation Easement, would reduce impacts to SSC habitat loss to less than significant, and for these reasons, the compensatory mitigation recommended in this comment is not needed to mitigate the potential impact of the Project on SSC habitat to less than significant.

Comment 1-20:

Evidence impact would be significant: A California Species of Special Concern is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria:

- is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;
- is listed as ESA-, but not CESA-, threatened, or endangered; meets the State definition of threatened or endangered but has not formally been listed;
- is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or,
- has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA threatened or endangered status (CDFW 2022a).

CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065). Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species by CDFW.

Response 1-20:

The comment includes the definition of California Species of Special Concern and clarification that CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC that can be shown to meet the criteria for State listing. Potential impacts to SSC that would result from implementation of the Project and mitigation measures that will reduce these impacts to a less than significant level are discussed in *Responses and 1-18* and *1-19* above and *Responses 1-21* and *1-22* below. This comment does not address the information, analysis or conclusions in the Draft EIR and, for this reason, no further response is necessary.

Comment 1-21:

When preparing a mitigation strategy for review, CDFW recommends including the following measures, at a minimum, to reduce impacts to less than significant.

Mitigation Measure #1: The qualified biologist should prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. A relocation plan should be prepared prior to implementing any Project-related ground-disturbing activities and vegetation removal.

While relocation is an option for mitigating impacts, it may not fully account for impacts to an SSC, such as loss of individuals, loss of habitat, or loss of natal dens/middens/burrows. Capturing, handling, or

relocation are acts that may have multiple unintended negative consequences, including increased stress and mortality of relocated animals, negative impacts on resident animals at release sites, increased conflicts with human interests, and the spread of diseases. Attempts to avoid impacts to SSC should be the first option.

Response 1-21:

The following mitigation measure will be added into the Final EIR as recommended in this comment.

MM 5.3-26 **Sensitive Species Protection Plan.** Prior to issuance of grading permits and at least thirty (30) days prior to the start of vegetation removal or grading activities, a qualified biologist shall prepare a Sensitive Species Protection Plan (SSPP) for species identified in the Draft EIR as being potentially present on the Project site, including, but not limited to, San Diego desert woodrat, San Diegan whiptail, sharp-shinned hawk, oak titmouse, Costa's hummingbird, and Vaux swift. This plan shall be provided to CDFW for their review and comment and approved by LACDRP prior to the issuance of grading permits. For any measures involving proposed species relocations, the SSPP shall identify handling and relocation protocols and a minimum of two relocation sites with suitable, species-specific habitat within 0.25 miles away from the Project site, including a map of suitable relocation locations. The SSPP shall include avoidance and minimization measures as well as mitigation measures to offsite impacts to a specific species and/or its habitat. Written approval from CDFW shall be obtained when the SSPP is finalized. The SSPP shall be amended for any new species observed within or adjacent to the Project area or that CDFW determines may be impacted by Project activities.

Comment 1-22:

Mitigation Measure #2: CDFW recommends providing compensatory mitigation for temporary and permanent loss of any habitat supporting SSC. There should be no net loss of habitat supporting SSC [CEQA Guidelines, § 15370(e)]. Compensatory mitigation should be provided within the Project boundary at no less than 2:1. Mitigation should provide appropriate habitat (depending on the species), refugia, and habitat structures that supports that species (e.g., woody material, rocks, brush piles, pools, burrows). Any proposed mitigation area/plan should include a discussion on the territory size; nesting, breeding, foraging, and refuge, locations, invasive, non-native plant and wildlife species present, food availability, and how all life cycle functions will be mitigated. Mitigation for impacts to an SSC should adhere to CDFW and/or USFWS established protocol/guidelines if available.

Response 1-22:

Please see *Response 1-19* regarding compensatory mitigation for temporary and permanent loss of any habitat supporting SSC.

Comment 1-23:

Issue: The Project's proposed mitigation MM 5.3-21 for impacts to 12 coast live oak trees (*Quercus agrifolia)* may be insufficient.

Specific impact: The Project will remove 12 individual oak trees. Replacement activities for mitigation, especially the location of the replacement trees, may not be sufficient to provide no net loss of oak trees on site. In addition, removing these oak trees may cause temporary or permanent impacts to wildlife that utilize the tree as habitat.

Why impacts would occur: MM 5.3-21 states, "The 12 coast live oak trees shall be locally sourced 1-gallon oak trees planted on preferably north-facing slopes within the northwest corner of the VTTM [Vesting Tentative Tract Map No. 60257] site in Fuel Modification Zone C." MM 5.3-21 as it is currently proposed may be insufficient for mitigating impacts to oak trees. A 1:1 mitigation ratio does not account for the potential failure of the replacement oaks that will be planted. In addition, a 1:1 replacement would not account for the temporal loss of oak trees and impacts on oak woodland-dependent birds and wildlife. Even if replacement oak trees survive transplanting, oak tree saplings could remain small and shrubby for many years. It may take 20 to 40 years, potentially longer under drought conditions, for replacement oak trees to reach maturity and provide services such as food, cover, nesting sites, and foraging sites for birds and other wildlife. In addition, the Project may reduce the footprint of available nesting and perching habitat and structure for birds.

Response 1-23:

The comment suggests that the Project's proposed mitigation **MM 5.3-21 Oak Plantings in VTTM Site Fuel Modification Zone C** for impacts to 12 coast live oak trees (*Quercus agrifolia*) may not be sufficient and that the temporal loss of oaks could result in impacts to wildlife.

As detailed in the Draft EIR, development within the VTTM site and Off-Site Roadway Improvement Area would result in the removal of two oak trees. Additionally, two protected oak trees located within the VTTM site and Off-Site Roadway Improvement Area would not be disturbed by active construction-related activities or grading; therefore, these trees would be preserved in place. Pursuant to the County Oak Tree Ordinance, the Project would be required to either replace the removed trees per County standards or pay in-lieu fees at the appraised cost for all proposed protected tree removals. Therefore, the Project would implement recommended **MM 5.3-21 Oak Plantings in VTTM Site Fuel Modification Zone C** and MM 5.3-22 Tree Protection Measures to ensure that potential impacts to protected oak trees in the VTTM would be less than significant. Per **MM 5.3-21 Oak Plantings in VTTM Site Fuel Modification Zone C**, a total of 12 coast live oak trees will be planted, maintained, monitored, and reported on within the VTTM site. Replacement would occur at a mitigation ratio of 6:1 (not 1:1, as referenced in the comment) and revisions to the Draft EIR are not necessary.

The temporal loss of two oak trees would not substantially reduce the available habitat for wildlife species in the Project vicinity and, therefore, would not result in a significant impact to wildlife.

Development at the Off-Site Water Tank Area would result in the removal of 12 protected oak trees. Pursuant to the County Oak Tree Ordinance, the Project would be required to either replace the removed trees per County standards or pay in-lieu fees at the appraised cost for all proposed protected tree removals. As detailed in the Draft EIR, the removal of 12 protected oak trees at the Off-Site Water Tank Area is associated with potential impacts to 0.61 acre of oak woodland canopy in accordance with the Oak Woodlands Conservation Management Plan Guide (County 2011, 2014). To offset the Project's total combined significant impact of 0.61 acres of oak woodland canopy in OW2 and OW3 and the Project's impacts to 12 protected oak trees at the Off-Site Water Tank Area, the Project would implement **MM 5.3-20 Off-Site Water Tank Area Oak Woodland Mitigation and Oak Tree Mitigation**, which includes "[…] one of the following mitigation measures shall be implemented, subject to County approval: 1. Purchase of mitigation credits for 1.22 acres of oak woodlands from an off-site oak woodland habitat preservation area owned by a third party; or 2. Contribute to the County's Oak Forests Special Fund in an amount of $97,040 (two times the canopy cover area value)."

If the purchase of mitigation credits for 1.22 acres of oak woodlands from an off-site oak woodland habitat preservation area owned by a third party is the selected mitigation, an area twice the impacted area (0.61 acres) would be purchased as mitigation credits. Since oak woodland mitigation would be implemented, the loss of oak trees and wildlife habitat would be temporary. Mitigation credits would be purchased to mitigate at 2:1 for impacted oak woodlands. Third party-owned off-site woodland habitat preservation areas are required to have approved Habitat Mitigation Monitoring Plans that include long-term monitoring, maintenance, contingency requirements, and reporting and compliance with performance standards (often including tree survival and size). Through these long-term requirements, the oak woodland mitigation area twice the size of the impacted area would be monitored and maintained to comply with performance standards and the oak woodland mitigation area would ultimately provide an increase in the biological services relative to the impacted area such as increased food, cover, nesting sites, and foraging sites for birds and other wildlife since the mitigation area would be larger than the impacted area.

If the Project's contribution to the County's Oak Forests Special Fund in an amount of $97,040 (two times the canopy cover area value) is the selected mitigation and habitat creation is implemented, an amount twice the value of the impacted canopy cover area value would be created. If this mitigation option is selected, the Project would contribute to the County's Oak Forests Special Fund in an amount of $97,040 and, through coordination with the County, the funds will be used for revegetation, maintenance, and monitoring which would provide services such as food, cover, nesting sites, and foraging sites for birds and

other wildlife. Since oak woodland mitigation would be implemented, the loss of oak trees and wildlife habitat would be temporary. Ultimately the County's Oak Forests Special Fund contributions would allow for creation of two times the canopy cover area value impacted and thus the resulting mitigation through revegetation, maintenance, and monitoring would provide an increase in the biological services of the mitigation site (located within the same watershed as the Project site) such as increased food, cover, nesting sites, and foraging sites for birds and other wildlife.

Comment 1-24:

Moreover, the Project proposes to plant oak trees within the Fuel Modification Zone C. Vegetation within fuel modification zones are permanently impacted because vegetation would be regularly thinned, trimmed, and removed, and potentially subjected to controlled burning. According to the Los Angeles County Oak Woodlands Conservation Management Plan (May 2011), activities such as the removal of understory shrubs and limbing/thinning oak trees will result in the loss of structural and species diversity. In addition, these activities may also result in increased fragmentation that will impact long-term sustainability. Oak trees planted for mitigation in Fuel Modification Zone C would be impacted by such disturbance activities, which may impact the success of establishing new trees.

Response 1-24:

The comment questions the location of the mitigation oak trees within Fuel Modification Zone C.

The 12 oak trees to be planted in the Fuel Modification Zone C would mitigate the impacts of removing two oaks within the VTTM site and Off-Site Roadway Improvement Area at a 6:1 ratio. Through site surveys, habitat assessments, and input from biologists, including County biologists, it was determined the most appropriate location for mitigation of coast live oak trees is within Fuel Modification Zone C as vegetation in this zone would be thinned and maintained but not irrigated. Although some thinning and maintenance would occur, the mitigation location of Fuel Modification Zone C was chosen to allow the replacement oak trees to be planted on north-facing slopes, on non-graded slopes within natural open space, and in areas that would avoid native habitat disturbance.

The two impacted trees that are being mitigated by planting within Fuel Modification Zone C are not woodland trees, instead they are growing as widely separated individuals in a relatively disturbed roadside area and therefore the habitat level impacts are less of a concern than they would be if the trees were within a woodland. The habitat conditions in Fuel Modification Zone C are expected to be less subject to disturbance than the locations of the existing trees, which are along a roadside and subject to root crown burial (from road maintenance) and drastic pruning (from utility line maintenance). Additionally, the Fuel Modification Zone C planting locations are to be within native, ungraded soils.

As described in the Draft EIR, landscape within Fuel Modification Zone C would consist mainly of modified existing vegetation and planting of replacement oak trees. Existing native vegetation would be modified by thinning and removing species constituting a high fire risk. Within Fuel Modification Zone C existing vegetation, currently mapped as Brassica nigra–Bromus diandrus semi-natural association and California sagebrush–California buckwheat scrub alliance would be modified by thinning and removing species constituting a high fire risk. After installing the coast live oak tree individuals, thinning and removing species constituting a high fire risk would decrease species competition during establishment. In the long-term, thinning and removing species constituting a high fire risk would decrease understory species diversity but would not directly impact the planted oak trees (no direct tree thinning or root disturbance). Additionally, the coast live oak trees would be located in an area currently without trees thus increasing nesting and perching habitat.

The Draft EIR considers all Project impacts, grading limits and fuel modification zone impacts, as permanent impacts. Therefore, fuel modification zone vegetation impacts are considered permanent impacts and mitigation for these impacts was addressed in the Draft EIR as required. Additionally, due to the Project type, residential, and related potential risks it is unlikely that the fuel modification zones would be subjected to controlled burning.

As part of **MM 5.3-21 Oak Plantings in VTTM Site Fuel Modification Zone C**, the trees would be locally sourced one-gallon oaks and would be subject to a seven-year monitoring period by an independent third-party certified arborist. The monitoring would consider growth, health, and condition of the subject trees to evaluate success. The establishment of the monitoring plan and monitoring efforts would result in recommendation of remedial actions should any of the tree plantings exhibit poor or declining health. The monitoring program would ensure the successful establishment of the new trees. Please see *Response 1-23* regarding mitigation for the loss of oak trees and oak woodlands in the Off-site Water Tank Area.

Comment 1-25:

Evidence impacts would be significant: Oak trees provide nesting and perching habitat for approximately 170 species of birds (Griffin and Muick 1990). Coast live oak and old-growth oak trees (native oak tree that is greater than 15 inches in diameter) are of importance due to increased biological values and increased temporal loss. Due to the historic and on-going loss of this ecologically important vegetation community, oak trees and woodlands are protected by local and State ordinances. The Los Angeles County Oak Tree Ordinance was established to recognize oak trees as significant historical, aesthetic, and ecological resources. CDFW considers oak woodlands a sensitive vegetation community.

Response 1-25:

The comment states the oak trees provide nesting and perching habitat for approximately 170 species of birds (Griffin and Muick 1990) and that coast live oak and old-growth oak trees are of importance due to

increased biological values and increased temporal loss. The Los Angeles County Oak Tree Ordinance was established to recognize oak trees as significantly historical, aesthetic, and ecological resources. CDFW considers oak woodlands a sensitive vegetation community.

LACDRP agrees that oak trees provide nesting and perching habitat. The Los Angeles County Oak Tree Ordinance was established to recognize oak trees as significant historical, aesthetic, and ecological resources. Oak woodlands as defined in California Natural Community List (CDFW 2021) including the coast live oak woodland and forest alliance (71.060.00) is S4 (not sensitive) and the *Quercus agrifolia* association (71.060.02) is also not considered sensitive.[12] The Oak Woodlands Conservation Management Plan (County of Los Angeles 2011) adopted by the County defines a delineation protocol for oak woodland. The trees are not woodland trees, but instead are isolated individuals within relatively disturbed habitat. Therefore, these trees are not considered woodland and the replacement by planting at 6:1 within similar (or better) habitat is sufficient to mitigate their removal.

Oak tree impacts are discussed in *Response 1-23* and mitigated through implementation of **MM 5.3-21 Oak Plantings in VTTM Site Fuel Modification Zone C** and MM 5.3-22 Tree Protection Measures. Oak woodland and oak tree impacts in the Off-Site Water Tank Area are discussed in *Responses 1-23* and *1-24* and mitigated through implementation of **MM 5.3-20 Off-Site Water Tank Area Oak Woodland Mitigation and Oak Tree Mitigation** and MM 5.3-22 Tree Protection Measures. This comment has been noted and revisions to the Draft EIR are not necessary.

Comment 1-26:

The proposed mitigation measures in the Draft EIR may result in an ultimate total net loss of oak trees associated with the Project activities. Moreover, trees on site provide habitat for wildlife within the Project vicinity and the mitigation leads to a total net loss of trees on site. These trees may provide adequate habitat for nesting birds and small mammals. Removal of trees on site may temporarily or permanently impact available habitat for wildlife in the area.

Response 1-26:

The commenter suggests that the proposed mitigation measures in the Draft EIR may result in an ultimate total net loss of oak trees associated with the Project activities.

As detailed in the Draft EIR, development within the VTTM site and Off-Site Roadway Improvement Area would result in the removal of two oak trees. Additionally, two protected oak trees located within the VTTM site and Off-Site Roadway Improvement Area would not be disturbed by active construction-related

12 CDFW (California Department of Fish and Wildlife). 2021. California Natural Community List. August 18, 2021. Accessed January 2022. https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#natural%20communities%20lists

activities or grading; therefore, these trees would be preserved in place. Pursuant to the County Oak Tree Ordinance, the Project would be required to either replace the removed trees per County standards or pay in-lieu fees at the appraised cost for all proposed protected tree removals. Therefore, the Project would implement recommended **MM 5.3-21 Oak Plantings in VTTM Site Fuel Modification Zone C** and MM 5.3-22 Tree Protection Measures to ensure that potential impacts to protected oak trees would be less than significant. With implementation of **MM 5.3-21 Oak Plantings in VTTM Site Fuel Modification Zone C** a total of 12 coast live oak trees would be planted, maintained, monitored, and reported on within the VTTM site. Project development within the VTTM site and Off-Site Roadway Improvement Area would result in the removal of two oak trees. Loss of habitat for nesting birds and small mammals would not be significant as only two trees would be removed and there is suitable habitat for nesting birds and small mammals in adjacent areas and the impacts would be temporary since replacement would occur at a 6:1 mitigation ratio. Through implementation of **MM 5.3-21 Oak Plantings in VTTM Site Fuel Modification Zone C**, the total number of oak trees within the Project site would increase providing an increased amount of habitat for nesting birds and small mammals.

Development at the Off-Site Water Tank Area would result in the removal of 12 protected oak trees. Pursuant to the County Oak Tree Ordinance, the Project would be required to either replace the removed trees per County standards or pay in-lieu fees at the appraised cost for all proposed protected tree removals. As detailed in the Draft EIR, the removal of 12 protected oak trees at the Off-Site Water Tank Area is associated with potential impacts to 0.61 acre of oak woodland canopy in accordance with the Oak Woodlands Conservation Management Plan Guide (County 2011, 2014). To offset the Project's total combined significant impact of 0.61 acres of oak woodland canopy in OW2 and OW3 and the Project's impacts to 12 protected oak trees at the Off-Site Water Tank Area, the Project would implement **MM 5.3-20 Off-Site Water Tank Area Oak Woodland Mitigation and Oak Tree Mitigation**, which includes "[…] one of the following mitigation measures shall be implemented, subject to County approval: 1. Purchase of mitigation credits for 1.22 acres of oak woodlands from an off-site oak woodland habitat preservation area owned by a third party; or 2. Contribute to the County's Oak Forests Special Fund in an amount of $97,040 (two times the canopy cover area value)."

If the purchase of mitigation credits for 1.22 acres of oak woodlands from an off-site oak woodland habitat preservation area owned by a third party is the selected mitigation, an area twice the impacted area (0.61 acres) would be purchased as mitigation credits. Since oak woodland mitigation would be implemented, the loss of oak trees and wildlife habitat would be temporary. Mitigation credits would be purchased to mitigate at 2:1 for impacted oak woodlands. Third party-owned off-site woodland habitat preservation areas are required to have approved Habitat Mitigation Monitoring Plans that include long-term monitoring, maintenance, contingency requirements, and reporting and compliance with performance

standards (often including tree survival and size). Through these long-term requirements, the oak woodland habitat twice the size of the impacted area would be monitored and maintained to comply with performance standards and the oak woodland habitat would ultimately provide twice the amount of oak woodlands impacted and an increase in the biological services of the impacted area such as increased food, cover, nesting sites, and foraging sites for birds and other wildlife since the mitigation area would be larger than the impacted area.

If the Project's contribution to the County's Oak Forests Special Fund in an amount of $97,040 (two times the canopy cover area value) is the selected mitigation and habitat creation is implemented, an amount twice the value of the impacted canopy cover area value would be created. If this mitigation option is selected, the Project would contribute to the County's Oak Forests Special Fund in an amount of $97,040 and, through coordination with the County, the funds will be used for revegetation, maintenance, and monitoring which would provide services such as food, cover, nesting sites, and foraging sites for birds and other wildlife. Since oak woodland mitigation would be implemented, the loss of oak trees and wildlife habitat would be temporary. Ultimately the County's Oak Forests Special Fund contributions would allow for creation of two times the canopy cover area value impacted and thus the resulting mitigation through revegetation, maintenance, and monitoring would provide an increase in the biological services of the mitigation site (located within the same watershed as the Project site) such as increased food, cover, nesting sites, and foraging sites for birds and other wildlife.

Comment 1-27:

Mitigation Measure #1: CDFW recommends a minimum mitigation ratio of 3:1 for impacts to coast live oak trees. Coast live oak trees may be difficult to establish from seed or sapling, especially under drought conditions. A mitigation of 1:1 would be inadequate if replacement trees are unsuccessful. A higher mitigation ratio would account for mortality and attrition of replacement coast live oak trees, and potential mortality of any oak trees marked for preservation. If all replacement trees survive and reach reproductive maturity, this will have a net benefit for birds.

Response 1-27:

As detailed in the Draft EIR, development within the VTTM site and Off-Site Roadway Improvement Area would result in the removal of two oak trees. Additionally, two protected oak trees located within the VTTM site and Off-Site Roadway Improvement Area would not be disturbed by active construction-related activities or grading; therefore, these trees would be preserved in place. Pursuant to the County Oak Tree Ordinance, the Project would be required to either replace the removed trees per County standards or pay in-lieu fees at the appraised cost for all proposed protected tree removals. Therefore, the Project would implement recommended **MM 5.3-21 Oak Plantings in VTTM Site Fuel Modification Zone C** and MM 5.3-22 Tree Protection Measures to ensure that potential impacts to protected oak trees in the VTTM

would be less than significant. Per **MM 5.3-21 Oak Plantings in VTTM Site Fuel Modification Zone C**, a total of 12 coast live oak trees will be planted, maintained, monitored, and reported on within the VTTM site. Replacement would occur at a mitigation ratio of 6:1 which is greater than the mitigation ratio of 3:1 referenced in Comment 1-27, and revisions to the Draft EIR are not necessary.

As part of **MM 5.3-21 Oak Plantings in VTTM Site Fuel Modification Zone C**, the trees would be locally sourced 1-gallon oaks and would be subject to a 7-year monitoring period by an independent third-party certified arborist. The monitoring would consider growth, health, and condition of the subject trees to evaluate success. The establishment of the monitoring plan and monitoring efforts would result in recommendation of remedial actions should any of the tree plantings exhibit poor or declining health. As such, this monitoring plan would ensure successful establishment of the new trees.

Comment 1-28:

Mitigation Measure #2: CDFW recommends that replacement trees are not planted within any fuel modification zone. It is recommended that they are planted in an area suitable for oak growth, especially in areas where oaks are already found, potentially in the Off-site Water Tank Site location.

Response 1-28:

The full extent of the Off-Site Water Tank Area is being developed and the adjacent lands are not owned by the Applicant. Therefore, there are no coast live oak tree mitigation opportunities at or around the Off-Site Water Tank Area. Please see *Responses 1-24* and *1-27* above regarding planting of oaks in Zone C of the fuel modification zone.

Comment 1-29:

Mitigation Measure #3: Replacement oaks should be of the same species and come from nursery stock grown from locally sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they were planted.

Response 1-29:

MM 5.3-21 Oak Plantings in VTTM Site Fuel Modification Zone C included in the Draft EIR requires that the coast live oak trees be locally sourced consistent with this recommendation. The mitigation measure has been revised to include more specifics on the local nature of the oak individuals.

MM 5.3-21 **Oak Plantings in VTTM Site Fuel Modification Zone C.** A total of 12 coast live oak (*Quercus agrifolia*) trees shall be planted, maintained, monitored, and reported on within the VTTM site. The 12 coast live oak trees shall be locally sourced <u>(from nursery stock grown from locally sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they were planted)</u> 1-gallon oak trees planted on preferably north-

facing slopes within the northwest corner of the VTTM site in Fuel Modification Zone C, on non-graded slopes within natural open space, avoiding native habitat disturbance. The planted trees shall be subject to a 7-year monitoring period by an independent third-party certified arborist. This monitoring effort shall consider growth, health, and condition of the subject trees to evaluate success. The monitoring efforts shall result in recommendations of remedial actions should any of the tree plantings exhibit poor or declining health.

Comment 1-30:

Issue: The Project's proposed mitigation MM 5.3-1 may be insufficient to mitigate for impacts to slender mariposa lily (*Calochortus clavatus var. gracilis*).

Specific impacts: The Draft EIR proposes to develop a Slender Mariposa Lily Mitigation and Monitoring Plan (SMLMMP) and translocate slender mariposa lily to the Open Space Dedication Area. Given the experimental nature of translocation, the survival and persistence of translocated slender mariposa lily may be unsuccessful. In addition, increasing the slender mariposa lily population within the Open Space Dedication Area through translocation may exceed the carrying capacity, resulting in increased competition and ultimately unsuccessful establishment. Finally, additional creation or enhancement activities in the Open Space Dedication Area may result in further impacts to the existing slender mariposa lily population and vegetation communities.

Why impacts would occur: The Draft EIR states the SMLMMP, "shall include, at minimum 5:1, mitigation for impacts to 171 slender mariposa lily individuals, as well as preservation of the existing population of slender mariposa lily individuals already documented within the Open Space Dedication Area conservation easement. The 5:1 mitigation ratio for planted mariposa lilies shall be affected through overplanting at 10:1 (mitigation plantings: impacted individuals), in order to accommodate potential mortality of slender mariposa lily individuals and the difficulty of censusing populations due to low frequency of flowering." CDFW generally does not support the use of translocation as the primary mitigation strategy for unavoidable impacts to rare, threatened, or endangered plant or animal species. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving sensitive plants and animals and their habitats.

According to the SMLMMP, there will be 1,668 individual slender mariposa lilies transplanted to the Open Space Dedication Area that already has 42 lilies identified on site. CDFW is concerned that the Open Space Dedication Area may not be able to support an almost 4000 percent increase in number of individuals compared to the existing population. The proposed transplantation may exceed the carrying capacity of the site, resulting in unsuccessful mitigation. In addition, activities associated with transplanting may impact slender mariposa lilies in situ of the Open Space Dedication Area. Transplanting activities (such trampling under foot or wheels, digging new holes for bulbs, soil disturbance, soil compaction) may

temporarily disturb or permanently remove other slender mariposa lilies or other vegetation in situ of the Open Space Dedication Area.

Finally, Options 2 and 3 of MM 5.3-17 include "Creation/enhancement of Palmer's goldenbush within portions of the proposed Open Space Dedication Area conservation easement and/or open space areas within the VTTM site." CDFW is concerned that creation or enhancement activities may impact existing slender mariposa lilies in that area.

Response 1-30:

Please see the attached memo, *Evaluation of the Likelihood of Success for Proposed Slender Mariposa Lily Mitigation for the Sterling Ranch Estates Residential Project* (Dudek 2022). Also, please see *Response 1-35* regarding Palmer's goldenbush scrub mitigation.

Comment 1-31:

Evidence impacts would be significant: Slender mariposa lily has a State rarity ranking of 1B.2. CDFW considers plant communities, alliances, and associations with a State ranking of S1, S2, and S3 as sensitive and declining at the local and regional level. An S1 ranking indicates there are 21 to 100 viable occurrences of this community in existence in California, S2 has six to 20 occurrences, and S1 has fewer than six viable occurrences (Sawyer et al. 2009). Given the State Rarity ranking, inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW and/or United States Fish and Wildlife Service (USFWS).

Response 1-31:

Slender mariposa lily is not federally or State-listed but is included as California Native Plant Society (CNPS) California Rare Plant Rank (CRPR) 1B.2. CRPR 1B is defined as Rare or Endangered—Plants rare, threatened, or endangered in California and elsewhere.[13] These plants are rare throughout their entire range with the majority also being endemic to California. Most of the plants that are ranked 1B have declined significantly over the last century. CRPR 1B plants constitute the majority of taxa in the CNPS Inventory, with more than 1,000 plants assigned to this category of rarity. CRPR threat rank 0.2 is defined as Moderately threatened in California – 20-80% of occurrences threatened/moderate degree and immediacy of threat.[14] The comment mentions that slender mariposa lily has a State rarity ranking of 1B.2, which is an error. The Special Vascular Plants, Bryophytes, and Lichens List includes slender mariposa lily

13 CNPS (California Native Plant Society). 2021a. Inventory of Rare and Endangered Plants of California (online ed., version 8-03 0.39). Sacramento, California: CNPS. Accessed January 2021. http://www.rareplants.cnps.org/.

14 CNPS (California Native Plant Society). 2021a. Inventory of Rare and Endangered Plants of California (online ed., version 8-03 0.39). Sacramento, California: CNPS. Accessed January 2021. http://www.rareplants.cnps.org/.

with a State Rank of S2S3.[15] S2 – Imperiled; at high risk of extirpation in the jurisdiction due to restricted range, few populations or occurrences, steep declines, severe threats, or other factors. S3 – Vulnerable; at moderate risk of extirpation in the jurisdiction due to a fairly restricted range, relatively few populations or occurrences, recent and widespread declines, threats, or other factors. As described in the previous response, the Draft EIR included mitigation to reduce the impact to slender mariposa lily to less than significant.

Comment 1-32:

Recommendation #1: CDFW recommends LACDRP require the Project Applicant to conduct an assessment of the effects of increased slender mariposa lily individuals and transplantation activities may have on vegetation and wildlife in situ of the Open Space Dedication Area. The Draft EIR should justify how the proposed compensatory mitigation would reduce the impacts of the Project to less than significant and not cause secondary impacts.

Response 1-32:

Please see the attached memo, *Evaluation of the Likelihood of Success for Proposed Slender Mariposa Lily Mitigation for the Sterling Ranch Estates Residential Project* (Dudek 2022).

Comment 1-33:

Recommendation #2: CDFW recommends LACDRP recirculate the Project's environmental document after the assessment to disclose information on the Open Space Dedication Area and potential impacts on those biological resources within that area considering the current mitigation for slender mariposa lily. Per CEQA Guidelines section 15088.5, "a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification."

Response 1-33:

Transplantation of slender mariposa lily to the Open Space Dedication Area will be implemented in accordance with the SMLMMP, as part of **MM 5.3-1 Conservation Easement**, which will take into consideration the existing vegetation at the Open Space Dedication Area. Vegetation communities have been identified in the Open Space Dedication Area and slender mariposa lily individuals will be incorporated into appropriate habitats as identified in the SMLMMP prepared as part of **MM 5.3-1 Conservation Easement**. Please see the attached memo, *Evaluation of the Likelihood of Success for Proposed Slender Mariposa Lily Mitigation for the Sterling Ranch Estates Residential Project* (Dudek 2022). Based on the rational for expecting mitigation success in the *Evaluation of the Likelihood of Success for*

15 California Natural Diversity Database (CNDDB). April 2022. Special Vascular Plants, Bryophytes, and Lichens List. California Department of Fish and Wildlife. Sacramento, CA. Accessed June 2022. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109383&inline.

Proposed Slender Mariposa Lily Mitigation for the Sterling Ranch Estates Residential Project (Dudek 2022) memo, recirculation of the Draft EIR due to the identification of new significant impacts is not required.

Comment 1-34:

Mitigation Measure #1: CDFW recommends mitigation should also include additional off-site, in-kind preservation within the County at the 10:1 ratio proposed, in the event of establishment failure to prevent a net loss of slender mariposa lily.

Response 1-34:

Implementation of **MM 5.3-1 Conservation Easement** will result in a conservation easement being recorded over the 37.9-acre Off-Site Open Space Dedication Area. The intent of the conservation easement is to protect, in perpetuity, viable native habitat that can support not just the known populations of slender mariposa lily and Peirson's morning-glory, but also translocated slender mariposa lilies. **MM 5.3-1 Conservation Easement** has been updated to include slender mariposa lily off-site mitigation with in-kind mitigation as a contingency.

MM 5.3-1 **Conservation Easement**. […] Monitoring shall take place annually and in perpetuity from the time of establishment of the conservation easement. If it appears that the population of any special-status plant species or the vegetation community composition and status are on the decline or have been degraded, remedial activities, shall be implemented according to the CMP and the SMLMMP. These activities may include weed control, additional seeding, native plant establishment, or other activities where appropriate. For instance, if the slender mariposa lily seeding and translocation does not progress towards a self-sustaining population, remediation actions will be implemented to achieve the 5:1 (mitigation plantings: impacted individuals) mitigation ratio for planted mariposa lilies. However, growth and development of SML can vary greatly with seasonal (i.e., winter/spring) environmental conditions. Therefore, the need for remedial action will be assessed in consideration of growth and development of the mitigation population relative to nearby reference populations, and remedial actions will be triggered when the mitigation population is observed to trend negatively in direct comparison to other SML reference populations. To supplement the shortfalls of slender mariposa lily mitigation at the Off-Site Open Space Dedication Area conservation easement, a contingency measure including additional off-site, in-kind preservation of slender mariposa lilies within the County shall be implemented at 10:1 (mitigation plantings: impacted individuals) to cumulatively achieve the 5:1 mitigation ratio. […]

Comment 1-35:

Issue: CDFW is concerned that the Project's proposed MM 5.3-17 may still result in net loss of Palmer's goldenbush scrub (*Ericameria palmeri*).

Specific impacts: Implementation of MM 5.3-17 may cause additional impacts to Palmer's goldenbush scrub on the mitigation sites, including the Open Space Dedication Area. Without disclosure of potential impacts on the mitigation sites, unidentified impacts may occur to Palmer's goldenbush scrub, resulting in a net loss to the species.

Why impacts would occur: The Draft EIR presented three options for mitigation to impacts to Palmer's goldenbush scrub.

- Option 1 requires creation of Palmer's goldenbush at a 1:1 ratio, resulting in 6.7 acres. The mitigation would occur in the on-site open space areas within the 113.9-acre area VTTM site. In addition, Option 1 would require establishment of a conservation easement where 31.9 acres of native scrub (a minimum of 0.2:1 in-kind and up to 5:1 out-of-kind) will be preserved in perpetuity.
- Option 2 requires creation or enhancement of Palmer's goldenbush at a 1:1 ratio, resulting in 6.7 acres. The mitigation would occur within portions of the proposed Open Space Dedication Area and/or open space areas within the VTTM site. Mitigation may also occur with preservation of existing native scrub alliance(s) with Palmer's goldenbush scrub association within portions of the proposed Open Space Dedication Area to total 6.7 acres. It also requires establishment of a conservation easement where 31.9 acres of native scrub (a minimum of 0.2:1 in-kind and up to 5:1 out-of-kind) will be preserved in perpetuity.
- Option 3 has the same requirement as Option 2. However, if on-site creation, enhancement, or preservation do not achieve a total of 3:1, off-site in-kind habitat creation and/or enhancement will be incorporated to achieve at total of 3:1. Off-site in-kind creation and/or enhancement of Palmer's goldenbush scrub at a mitigation bank, such as Land Veritas, will be established with an acreage appropriate to achieve a total mitigation ratio of 3:1.

For Options 1 and 2, it is unclear where the creation of 6.7 acres of Palmer's goldenbush will occur within the VTTM site or the Open Space Dedication Area. Without identifying the location of the mitigation site, CDFW is concerned that the mitigation site would not be conducive to successful propagation. For example, CDFW is concerned that it would not have the appropriate soil microenvironment, hydrology, carrying capacity, vegetation community, or other biotic and abiotic factors.

Option 2 and 3 include "preservation of existing native scrub alliance(s) with Palmer's goldenbush scrub association within portions of the proposed Open Space Dedication Area." According to the Manual of California Vegetation (2009) second edition, there are no associations with Palmer's goldenbush scrub alliance. Although the Open Space Dedication Area was mapped at an alliance level, the Draft EIR does not disclose mapping at an association level. Without mapping associations, CDFW is concerned that the mitigation might preserve a different habitat community than what would be impacted from the Project site. Without verification of the mitigation site, CDFW cannot determine if these preservation efforts are feasible.

Options 2 and 3 include, "Creation/enhancement of Palmer's goldenbush within portions of the proposed Open Space Dedication Area conservation easement and/or open space areas within the VTTM site."

These activities may temporarily disturb or permanently remove other vegetation in situ of the VTTM site or the Open Space Dedication Area. In addition, it is unclear if any creation or enhancement activities may impact any of the slender mariposa lilies in that area. Without identifying secondary impacts on the mitigation sites due to the creation/enhancement activities, the Project may result in further unmitigated impacts to Palmer's goldenbush scrub as well as other vegetation communities.

Finally, Option 3 includes "Off-site in-kind creation/enhancement of Palmer's goldenbush scrub at a mitigation bank, such as Land Veritas, will be established with an acreage appropriate to achieve a total of 3:1." It is unknown which mitigation bank would be selected. Therefore, CDFW cannot analyze the appropriateness of the mitigation bank for the species.

Response 1-35:

The Palmer's goldenbush scrub vegetation community on the Project site has an open shrub canopy less than 1.5 meters (4.9 feet) in height and a continuous herbaceous layer (Sawyer 2009). Palmer's goldenbush scrub occurs throughout the VTTM site and Off-Site Open Space Dedication Area, typically on gently sloping terrain at the base of hillslopes of varying aspect. Palmer's goldenbush scrub comprises 6.7 acres of the VTTM site and 1.4 acres of the Off-Site Open Space Dedication Area, for a total of 8.2 acres. Project activities within the VTTM would potentially affect 6.7 acres of Palmer's goldenbush scrub. **MM 5.3-1 Conservation Easement** will establish a conservation easement over 37.9 acres in the Off-Site Open Space Dedication Area, which includes 33.3 acres of coastal scrub (inclusive of 1.4 acres of Palmer's goldenbush scrub), to be preserved in perpetuity.

The Project Applicant team has been in contact with the owner of the Curtis Property, located south of California State Route 14 near Soledad Canyon Road, as a suitable site for Palmer's goldenbush scrub mitigation. **MM 5.3-17 Palmer's Goldenbush Scrub Mitigation** has been updated to include the preferred Palmer's goldenbush scrub mitigation option at an off-site area with suitable Palmer's goldenbush scrub mitigation, such as the Curtis Property. Additionally, the mitigation measure has been updated to include an option that includes off-site out-of-kind preservation.

MM 5.3-17 **Palmer's Goldenbush Scrub Mitigation**. Prior to the issuance of grading permits, to offset the Project's 6.7 acres of direct impacts to Palmer's goldenbush scrub, compensatory mitigation is required. Subject to County of Los Angeles Department of Regional Planning approval, there shall be a no net loss of Palmer's goldenbush scrub (1:1) ~~and total mitigation acreages shall be at a minimum of 3:1 (mitigation: impact acres)~~ and shall include one of the following measures. (Note that #1 below is the preferred mitigation option. #2, #3, #4, or #5 will be implemented if #1 is not feasible:

Preferred Palmer's Goldenbush Scrub Mitigation

1. **On-site in-kind preservation (0.2:1), on-site out-of-kind preservation (5:1), and off-site in-kind creation/enhancement (1:1):** In addition to the on-site preservation of

existing 1.4 acres of Palmer's goldenbush scrub and on-site habitat preservation of existing 31.9 acres of native scrub (not including Palmer's goldenbush scrub) through establishment of a conservation easement of the Off-Site Open Space Dedication Area through **MM 5.3-1 Conservation Easement**, the Project Developer shall implement the following:

- Off-site in-kind creation/enhancement of Palmer's goldenbush scrub at a property with suitable Palmer's goldenbush scrub habitat, such as the Land Veritas Curtis Property. A conservation easement will be recorded over the property and a total of 6.7 acres of Palmer's goldenbush scrub shall be created/enhanced. As part of the recording of the conservation easement, a Conservation Management Plan (CMP) shall be prepared that specifically identifies the required resource management activities and the entities that shall be responsible for managing those activities in perpetuity. The CMP shall identify Palmer's goldenbush scrub creation/enhancement methods, maintenance frequency, monitoring methods and frequency, success criteria, and reporting requirements.

Alternative Palmer's Goldenbush Scrub Mitigation if Preferred Palmer's Goldenbush Scrub Mitigation #1 is not feasible.

2. **On-site in-kind preservation (0.2:1), on-site out-of-kind preservation (5:1), and off-site out-of-kind preservation (5:1):** In addition to the on-site preservation of existing 1.4 acres of Palmer's goldenbush scrub and on-site habitat preservation of existing 31.9 acres of native scrub (not including Palmer's goldenbush scrub) through establishment of a conservation easement of the Off-Site Open Space Dedication Area through **MM 5.3-1 Conservation Easement**, the Project Developer shall implement the following:

   - Purchase of out-of-kind native scrub mitigation credits at an off-site mitigation bank, such as the Land Veritas Petersen Ranch, for the preservation of 33.5 acres of out-of-kind native scrub habitat, effectively mitigating for impacts to 6.7 acres of Palmer's goldenbush scrub through off-site out-of-kind preservation of native scrub at 5:1. Or, establishment of a deed restriction at an off-site property in Los Angeles County for the preservation of 33.5 acres of out-of-kind native scrub habitat, effectively mitigating for impacts to 6.7 acres of Palmer's goldenbush scrub through off-site out-of-kind preservation of native scrub at 5:1.

3. **On-site in-kind creation (1:1) and in-kind and out-of-kind preservation (0.2:1 and 5:1) (Total > 5.2:1):** In addition to the on-site habitat preservation of existing 1.4 acres of Palmer's goldenbush scrub within the Off-Site Open Space Dedication Area conservation easement, the Project Developer shall implement the following:

   - Creation of 6.7 acres of Palmer's goldenbush in the open space areas within the VTTM site (1:1).
   - Establishment of a conservation easement where 31.9 acres of native scrub (a minimum of 0.2:1 in-kind and up to 5:1 out-of-kind) will be preserved in perpetuity.

4. **On-site in-kind creation/enhancement and/or preservation (1:1) and in-kind and out-of-kind preservation (0.2:1 and 5:1) (Total > 5.2:1):** In addition to the on-site habitat preservation of existing 1.4 acres of Palmer's goldenbush scrub, the Project Developer shall implement the following:

    - Creation/enhancement of Palmer's goldenbush within portions of the proposed Off-Site Open Space Dedication Area conservation easement and/or open space areas within the VTTM site and/or preservation of existing native scrub alliance(s) with Palmer's goldenbush scrub association within portions of the proposed Off-site Open Space Dedication Area conservation easement to total 6.7 acres (1:1).
    - Establishment of a conservation easement where 31.9 acres of native scrub (a minimum of 0.2:1 in-kind and up to 5:1 out-of-kind*) shall be preserved in perpetuity. *The acreage of Palmer's goldenbush scrub association(s) shall count towards in-kind preservation.

5. **On-site in-kind creation/enhancement and/or preservation (1:1) and in-kind and out-of-kind preservation (0.2:1 and 5:1), plus off-site in-kind creation/enhancement:** In addition to the on-site habitat preservation of existing 1.4 acres of Palmer's goldenbush scrub, the Project Developer will commit to the following:

    - Creation/enhancement of Palmer's goldenbush within portions of the proposed Off-Site Open Space Dedication Area conservation easement and/or open space areas within the VTTM site and/or preservation of existing native scrub alliance(s) with Palmer's goldenbush scrub association within portions of the proposed Off-site Open Space Dedication Area conservation easement to total 6.7 acres (1:1).
    - Establishment of a conservation easement where 31.9 acres of native scrub (a minimum of 0.2:1 in-kind and up to 5:1 out-of-kind*) shall be preserved in perpetuity. *The acreage of Palmer's goldenbush scrub association(s) would count towards in-kind preservation.
    - If on-site in-kind creation/enhancement and/or preservation and in-kind and out-of-kind preservation do not achieve a total of 3:1 mitigation, off-site in-kind habitat creation/enhancement shall be incorporated to achieve at total of 3:1. Off-site in-kind creation/enhancement of Palmer's goldenbush scrub at a mitigation bank, such as Land Veritas Curtis Property, Los Angeles County, Upper Santa Clara River Mitigation Site, shall be established with an acreage appropriate to achieve a total of 3:1 mitigation.

Comment 1-36:

Evidence impacts would be significant: Palmer's goldenbush scrub has a State rarity ranking of 1B.1. CDFW considers plant communities, alliances, and associations with a State ranking of S1, S2, and S3 as sensitive and declining at the local and regional level. An S1 ranking indicates there are 21 to 100 viable occurrences of this community in existence in California, S2 has six to 20 occurrences, and S1 has fewer than six viable occurrences (Sawyer et al. 2009). Given the State rarity ranking, inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a

candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW and/or USFWS.

Response 1-36:

Please see Response 1-35 regarding mitigation for impacts to Palmer's goldenbush scrub.

Comment 1-37:

Recommendation #1: CDFW recommends LACDRP require the Project Applicant to conduct an assessment of each mitigation option and associated activities presented in MM 5,3-17 and the impacts they may have on vegetation and wildlife in situ of proposed areas in the VTTM site as well as the Open Space Dedication Area. The Draft EIR should justify how the proposed compensatory mitigation would reduce the impacts of the Project to less than significant and not cause secondary impacts.

Response 1-37:

Please see *Response 1-35* regarding mitigation for impacts to Palmer's goldenbush scrub.

Comment 1-38:

Recommendation #2: CDFW recommends LACDRP recirculate the Project's environmental document after the assessment to disclose information on the VTTM site and Open Space Dedication Area and potential impacts on those biological resources within that area considering the current mitigation for slender mariposa lily. Per CEQA Guidelines section 15088.5, "a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification."

Response 1-38:

The Project Applicant has previously reviewed and discussed the mitigation options with the CDFW and the County and these measures were agreed upon by all parties, and then included in the Draft EIR. Additionally, **MM 5.3-17 Palmer's Goldenbush Scrub Mitigation** has been updated to include the preferred Palmer's goldenbush scrub mitigation option. Please see edits to **MM 5.3-17 Palmer's Goldenbush Scrub Mitigation** above.

Please note that Section 15088.5 (a) (1) – (4) identifies the types of information that constitute "significant new information" which would require recirculation of an EIR. Information that identifies a new significant impact from a project or a mitigation measure is the primary definition. As discussed in previous responses, **MM 5.3-17 Palmer's Goldenbush Scrub Mitigation** has been updated to include the preferred Palmer's goldenbush scrub mitigation option and will be implemented in conjunction with **MM 5.3-1 Conservation Easement**. **MM 5.3-1 Conservation Easement** will include a CMP and will include a SMLMMP. The CMP and SMLMMP will be developed by qualified biologists and implemented by native habitat restoration experts familiar with biological resources present at the Open Space Dedication Area

and will be subject to approval by California Department of Fish and Wildlife and the County of Los Angeles. The CMP and SMLMMP will identify mitigation methods that will avoid and minimize impacts to sensitive biological resources and secondary impacts. Additionally, **MM 5.3-17 Palmer's Goldenbush Scrub Mitigation** has been updated to include the preferred Palmer's goldenbush scrub mitigation option. Off-site in-kind creation/enhancement of Palmer's goldenbush scrub at a property with suitable Palmer's goldenbush scrub habitat such as Curtis Property which was subject to historical mining and has opportunities for site restoration. No new significant impacts have been identified that require the recirculation of the Draft EIR due to the identification of new or substantially more severe impacts.

Comment 1-39:

Recommendation #3: If any of the native scrub alliances have an association with Palmers goldenbush scrub in areas of the Project site, there should be coordination with CDFW's Vegetation Classification and Mapping Program (VegCAMP) to map them according to Statewide standards.

Response 1-39:

As appropriate, if additional Palmer's goldenbush scrub is mapped during additional survey efforts, there will be coordination with CDFW's VegCAMP to map this habitat according to Statewide standards.

Comment 1-40:

Mitigation Measure #1: The Draft EIR should determine which (if any) mitigation bank managed by Land Veritas would be appropriate for the creation/enhancement of Palmer's goldenbush scrub. The bank should have appropriate habitat environment for Palmer's goldenbush scrub. The bank should also be within Los Angeles County and ideally within the vicinity of the Project site.

Response 1-40:

MM 5.3-17 Palmer's Goldenbush Scrub Mitigation has been revised to include the specific Land Veritas mitigation area that would be appropriate for the creation/enhancement of Palmer's goldenbush scrub as included in *Response 1-35* above.

Comment 1-41:

Issue: MM 5.3-20 states that an option for oak tree mitigation is to "Contribute to the County's Oak Forest Special Fund in an amount of $97,040 (two times the canopy cover area value)."

Specific impacts: The Draft EIR does not evaluate the adequacy of funds and how it offsets the cumulative loss of biological resources associated with oak woodlands.

Why impacts would occur: Under section III.9.2 Applying for Oak Funds in The Oak Woodlands Conservation Management Plan (2011), it states that the Oak Forest Special Fund "CANNOT be used for purchase of lands or easements that are required to satisfy a condition of project approval, including, but not limited to, a mitigation measure required pursuant to CEQA or mitigate a negative declaration (FGC

1366(b)).” It is unclear how proposed payment to the Oak Forest Special Fund would be adequate to offset impacts associated with the Project to less than significant under CEQA. The Draft EIR does not explain why the payment is adequate enough for preservation, enhancement, restoration, or other mitigation activities to offset impacts to sensitive species and habitats. The Draft EIR does not discuss or provide the following information:

1) How the Oak Forest Special Fund program is designed to (and will) mitigate the effects at issue at a level meaningful for purposes of CEQA;
2) What the fund would acquire. It is unclear if the fund would be used to acquire land for preservation, enhancement, and/or restoration purposes, or if the in-lieu fee would be used to purchase credits at a mitigation bank, or none of the above;
3) Why the fund is appropriate for mitigating cumulative loss of biological resources in the Project site;
4) How the fund is sufficient to purchase land or credits at a mitigation bank;
5) Where LACDRP may acquire land or purchase credits at a mitigation bank so that the inlieu fee would offset Project impacts on biological resources in the Project site;
6) When LACDRP would use the fee. Mitigation payment does not equate to mitigation if the funds are not being used. Also, temporal impacts on biological resources may occur as long as LACDRP fails to implement its proposed mitigation;
7) How the Project Applicant would commit to paying the fund. For example, when would LACDRP require payment from the Project Applicant, how long would the Project Applicant have to pay the fee, and what mechanisms would LACDRP implement to ensure the fee is paid? Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments (CEQA Guidelines, § 15126.4);
8) What performance measures the proposed mitigation would achieve (CEQA Guidelines, § 15126.4);
9) What type(s) of potential action(s) that can feasibly achieve those performance standards (CEQA Guidelines, § 15126.4); and,
10) How the in-lieu fee would be adequate such that no impacts would occur as a result of the Project.

In addition, The Oak Woodlands Conservation Management Plan states, "To date, it has been difficult to track these funds and identify who administers the dispersal of County’s Oak Forests Special Funds, as well as when and where they have been successfully used to purchase oak woodlands” (Los Angeles County 2011). Since it is unclear where and how the Oak Forest Special Fund is being utilized, CDFW is concerned how the Project would verify that mitigation was implemented and successful in reducing impacts below a significant level.

Evidence impacts would be significant: Without identifying when mitigation activities will be implemented, additional temporal impacts to biological resources would occur. Inadequate avoidance and mitigation measures will result in the Project continuing to have a substantial adverse direct and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by CDFW or USFWS. This Project may have the potential to reduce the habitat of rare plants or wildlife; cause rare plants or wildlife population to drop below self-sustaining levels; threatened to eliminate a plant or animal community; and substantially reduce the number or restrict the range of an endangered, rare, or threatened species [CEQA Guidelines, § 15065(a)(1)]. Additionally, this Project has possible environmental effects that are cumulatively considerable [CEQA Guidelines, § 15065(a)(3)].

Response 1-41:

SB 1334 allows developers to pay into a mitigation fund as part or all of mitigation measures for impacts to oak woodlands (CPRC 2004).[16] Payment can be made to either the state Wildlife Conservation Board, the CDFW, or to the agency administering oak conservation in the county where a CEQA review occurs, in this case Los Angeles County. In lieu of planting trees, developers can pay into the fund an amount equivalent to the value of the oak resource in compensation for removing oaks. The fund could be used to acquire established oak woodland for preservation, to improve existing habitat or to plant trees in appropriate locations. The original limited purpose of the Oak Tree Ordinance expanded to include both land acquisition and land revitalization. This expansion of purpose also suggests a focus not merely on protecting and replacing individual trees but on preserving and establishing plant communities.

Oak trees and oak woodlands are not special-status plant species or vegetation communities as identified by State agencies. However, oak trees as defined by Title 22.56.2060 are subject to County permit requirements pursuant to the Los Angeles County Oak Tree Ordinance, and coast live oak woodlands defined by California Fish and Wildlife Code Section 1361.h and by the Oak Woodlands Conservation Management Plan (County of Los Angeles 2011) may require mitigation measures to offset the losses.[17] As such, included in the Oak Woodlands Conservation Management Plan (County of Los Angeles 2011) are off-site replacement mitigation options for impacts to oak woodlands.[18] One option includes *"Contribute to the Los Angeles County's Oak Forests Fund at a MINUMUM ratio of 2:1 based on the space needed (acreage or parcel) to replace woodland removed. The contribution should include provisions for revegetation, maintenance, and monitoring and be based on actual purchase cost of identified parcel in mapped Potential Oak Woodlands Conservation Areas."*

As included in the Oak Woodland Report for the Sterling Ranch Estates – Water Tank Project (Dudek 2020), during the oak woodlands assessment tree trunk diameters were measured using a diameter tape providing adjusted figures for diameter measurements when wrapping the tape around an object's circumference. Diameter measurements were taken using protocol provided by the Council of Tree and Landscape Appraisers in the Guide for Plant Appraisal (ISA 2000). Based on the information recorded during the oak woodlands assessment including number of stems, individual stem diameters, height, canopy, health, structure, and protected and analysis through the Council of Tree and Landscape Appraisers in the Guide for Plant Appraisal (ISA 2000) an appraisal value was assigned to each tree. The Oak Woodland Report for the Sterling Ranch Estates – Water Tank Project (Dudek 2020) identified the cost

16 California Public Resources Code (CPRC). 2004. item 21083.1.

17 County of Los Angeles. 2011. Los Angeles County Oak Woodlands Conservation Management Plan. Prepared by The Los Angeles County Oak Woodlands Habitat Conservation Strategic Alliance. May 2011.

18 County of Los Angeles. 2011. Los Angeles County Oak Woodlands Conservation Management Plan. Prepared by The Los Angeles County Oak Woodlands Habitat Conservation Strategic Alliance. May 2011.

for all proposed oak woodland impacts to be $48,520 per the Oak Woodlands Conservation Management Plan (County of Los Angeles 2011) so two times the canopy cover area would be $97,040.[19]

As identified in the Oak Woodlands Conservation Management Plan (County of Los Angeles 2011), "*Both the state Oak Woodland Conservation Fund and the County Oak Forest Special Fund identify specific criteria for allocation of monies. These funds can be used for:*

- *Purchase of oak woodland conservation easements*
- *Land improvement that enhance oak woodlands*
- *Cost-sharing incentives for landowners who enter into long-term conservation easements*
- *Public education and outreach*
- *Technical assistance for the purpose of preserving oak woodlands."*

As stated in the Oak Woodlands Conservation Management Plan (County of Los Angeles 2011), consistent with the Los Angeles County Oak Tree Ordinance mitigation for impacts to oak woodlands can be satisfied with an in-lieu fee contribution to the County's Oak Forests Special Fund.[20] The funds are intended for the purchase of comparable acres of oak woodland that can be protected as public open space. Priority should be given to restoring moderately or severely degraded oak woodlands by removing invasive exotics and restoring appropriate plant diversity located nearby the impact property, preferably within the same watershed or sub-drainage. There are suitable areas within the watershed the Project site is located in with oak woodlands disturbed by activities such as oil well drilling and operations. These degraded oak woodlands would be candidate sites for mitigation based on presence of oak woodlands and the desire to restore moderately or severely degraded oak woodlands. Selection of oak woodlands for acquisition to meet off-site mitigation requirements should conform to the following criteria:

- *Adjacent to core oak woodland habitat area (either public or private).*
- *Sufficient size to provide superior wildlife values.*
- *Improve connectivity and reduce fragmentation.*
- *Improve wildlife corridors and linkages, especially in riparian areas.*
- *Meets suitability criteria for slope, aspect, drainage, etc. that would support restoration and regeneration.*
- *Contains a diverse size-class structure of oak woodland and/or a diversity of oak species that will promote the sustainability and perpetuation of oak woodlands.*
- *Contributes towards regional or community goals, provides scenic open space, protects historic or archeological values, or contains unique geologic features.*

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19 County of Los Angeles. 2011. Los Angeles County Oak Woodlands Conservation Management Plan. Prepared by The Los Angeles County Oak Woodlands Habitat Conservation Strategic Alliance. May 2011.

20 County of Los Angeles. 2011. Los Angeles County Oak Woodlands Conservation Management Plan. Prepared by The Los Angeles County Oak Woodlands Habitat Conservation Strategic Alliance. May 2011.

- *Removes or reduces the threat of habitat conversion from oak woodlands to some other use.*
- *Has the potential to serve as a stewardship model for other landowners*.

The Oak Woodlands Conservation Management Plan (County of Los Angeles 2011) identifies minimum criteria for a successful monitoring plan which include, but are not limited to:

- *Describing the baseline condition of the site;*
- *Describe the mitigation measures to be implemented; Identify measurable performance standards and a timeline;*
- *Describe how these performance standards will be documented;*
- *Describe an adaptive management strategy for dealing with problems;*
- *Provide a monitoring schedule; Identify a person or agency responsible for the on-the ground monitoring;*
- *Provide for reporting, organizing and managing data collected; Identify and provide adequate funding;*
- *Identify enforcement issues;*
- *Identify contingency measures, and;*
- *Provide a mechanism for long term protection.*

Comment 1-42:

Recommendation #1: CDFW recommends LACDRP revise the Project's environmental document to provide information that would address the following:

1) How the Oak Forest Special Fund is designed to (and will) mitigate the effects at issue at a level meaningful for purposes of CEQA;
2) Why the fund is appropriate for mitigating the cumulative loss of oak trees;
3) Why the fund is sufficient to purchase land or credits at a mitigation bank;
4) Where LACDRP may acquire land or purchase credits at a mitigation bank;
5) When LACDRP would use the fund; and,
6) How the fund would be adequate such that no impacts would occur as a result of the Project.

The Project's environmental document should provide any technical data, maps, plot plans, diagrams, and similar relevant information in addressing these concerns (CEQA Guidelines, § 15147).

Response 1-42:

Development at the Off-Site Water Tank Area would result in the removal of 12 protected oak trees. Pursuant to the County Oak Tree Ordinance, the Project would be required to either replace the removed trees per County standards or pay in-lieu fees at the appraised cost for all proposed protected tree removals. As detailed in the Draft EIR, the removal of 12 protected oak trees at the Off-Site Water Tank Area is associated with potential impacts to 0.61 acre of oak woodland canopy in accordance with the Oak Woodlands Conservation Management Plan Guide (County 2011, 2014). To offset the Project's total combined significant impact of 0.61 acres of oak woodland canopy in OW2 and OW3 and the Project's

impacts to 12 protected oak trees at the Off-Site Water Tank Area, the Project would implement **MM 5.3-20 Off-Site Water Tank Area Oak Woodland Mitigation and Oak Tree Mitigation, which** includes "[…] one of the following mitigation measures shall be implemented, subject to County approval: 1. Purchase of mitigation credits for 1.22 acres of oak woodlands from an off-site oak woodland habitat preservation area owned by a third party; or 2. Contribute to the County's Oak Forests Special Fund in an amount of $97,040 (two times the canopy cover area value)."

If the purchase of mitigation credits for 1.22 acres of oak woodlands from an off-site oak woodland habitat preservation area owned by a third party is the selected mitigation, an area twice the impacted area (0.61 acres) would be purchased as mitigation credits. Since oak woodland mitigation would be implemented, the loss of oak trees and wildlife habitat would be temporary. Mitigation credits would be purchased to mitigate at 2:1 for impacted oak woodlands. Third party-owned off-site woodland habitat preservation areas are required to have approved Habitat Mitigation Monitoring Plans that include long-term monitoring, maintenance, contingency requirements, and reporting and compliance with performance standards (often including tree survival and size). Through these long-term requirements, the oak woodland habitat twice the size of the impacted area would be monitored and maintained to comply with performance standards and the oak woodland habitat would ultimately provide twice the amount of oak woodlands impacted and an increase in the biological services of the impacted area such as increased food, cover, nesting sites, and foraging sites for birds and other wildlife since the mitigation area would be larger than the impacted area.

As described in *Response 1-41*, the Oak Woodlands Conservation Management Plan (County of Los Angeles 2011) identifies minimum criteria for a successful monitoring plan which includes monitoring, adaptive management strategies, and contingency measures to achieve measurable performance standards.[21]

Based on the information recorded during the oak woodlands assessment including number of stems, individual stem diameters, height, canopy, health, structure, and protected and analysis through the Council of Tree and Landscape Appraisers in the Guide for Plant Appraisal (ISA 2000) an appraisal value was assigned to each tree. The Oak Woodland Report for the Sterling Ranch Estates–Water Tank Project (Dudek 2020) identified the cost for all proposed oak woodland impacts to be $48,520 per the Oak Woodlands Conservation Management Plan (County of Los Angeles 2011) so two times the canopy cover area would be $97,040.[22] Contributing to the County's Oak Forests Special Fund in an amount of two times

21 County of Los Angeles. 2011. Los Angeles County Oak Woodlands Conservation Management Plan. Prepared by The Los Angeles County Oak Woodlands Habitat Conservation Strategic Alliance. May 2011.

22 County of Los Angeles. 2011. Los Angeles County Oak Woodlands Conservation Management Plan. Prepared by The Los Angeles County Oak Woodlands Habitat Conservation Strategic Alliance. May 2011.

the canopy cover area value allow for funding to the County Oak Forest Special Fund identified specific criteria for allocation of monies which will mitigate for the loss of the oak trees through purchase of oak woodland conservation easements, land improvements that enhance oak woodlands, cost-sharing incentives for landowners who enter into long-term conservation easements, public education and outreach, or technical assistance for the purpose of preserving oak woodlands.

As stated in the Oak Woodlands Conservation Management Plan Guide (County 2011, 2014), to ensure that mitigation measures are implemented the County Forester may require the Project Applicant post a bond in the amount determined by the County Forester.

If the Project's contribution to the County's Oak Forests Special Fund in an amount of $97,040 (two times the canopy cover area value) is the selected mitigation and habitat creation is implemented, an amount twice the value of the impacted canopy cover area value would be created. If this mitigation option is selected, the Project would contribute to the County's Oak Forests Special Fund in an amount of $97,040 and, through coordination with the County, the funds will be used for revegetation, maintenance, and monitoring which would provide services such as food, cover, nesting sites, and foraging sites for birds and other wildlife. Since oak woodland mitigation would be implemented, the loss of oak trees and wildlife habitat would be temporary. Ultimately the County's Oak Forests Special Fund contributions would allow for creation of two times the canopy cover area value impacted and thus the resulting mitigation through revegetation, maintenance, and monitoring would provide an increase in the biological services of the mitigation site (located within the same watershed as the Project site) such as increased food, cover, nesting sites, and foraging sites for birds and other wildlife.

The Guide for Plant Appraisal (ISA 2000) describes the various tree appraisal processes, is a critical resource for sound plant evaluation, and is endorsed by major horticulture, arboriculture, and real estate organizations. Therefore, the resulting appraisal amounts are considered appropriate for the subject trees. If an in-lieu fee is provided to the County, it will be sufficient to provide equivalent mitigation under Option #1 to purchase 1.22 acres of land and other associated costs to manage the acreage.

There are suitable areas within the Project site watershed with disturbed oak woodlands from disturbance activities such as oil well drilling and operations. These degraded oak woodlands would be candidate sites for mitigation based on presence of oak woodlands and the desire to restore moderately or severely degraded oak woodlands. Additionally, private landowners with the degraded oak woodlands would be incentivized to sell their land for a profit or reduced taxes.

If no impacts would occur as a result of the Project, the Project's contribution to the County's Oak Forests Special Fund in an amount of $97,040 (two times the canopy cover area value), the fund would be

adequate such that it could be used to purchase of oak woodland conservation easements, land improvements that enhance oak woodlands, cost-sharing incentives for landowners who enter into long-term conservation easements, public education and outreach, or technical assistance for the purpose of preserving oak woodlands as there would be no mitigation need for oak woodland impacts.

Comment 1-43:

Recommendation #2: CDFW recommends that the environmental document provide a discussion describing how LACDRP intends to commit the Project Applicant to mitigation through payment into the Oak Forest Special Fund. For example, the environmental document should provide specifics as to when LACDRP would require payment, what mechanisms would the LACDRP implement to ensure the fee is paid, and when LACDRP would use the Project Applicant's payment for mitigation. Also, the environmental document should provide specific performance standards and actions to achieve those performance standards.

Response 1-43:

As discussed in the Draft EIR, **MM 5.3-20 Off-Site Water Tank Area Oak Woodland Mitigation and Oak Tree Mitigation** includes:

MM 5.3-20 **Off-Site Water Tank Area Oak Woodland Mitigation and Oak Tree Mitigation.** Prior to issuance of grading permits, in accordance with the Oak Woodlands Conservation Management Plan Guide (County 2011, 2014), to offset the Project's total combined significant impact of 0.61 acres of oak woodland canopy in OW2 and OW3 and, in accordance with the County Oak Tree Ordinance to offset the Project's impacts to 12 protected oak trees at the Off-Site Water Tank Area, one of the following mitigation measures shall be implemented, subject to County approval:

1. Purchase of mitigation credits for 1.22 acres of oak woodlands from an off-site oak woodland habitat preservation area owned by a third party; or

2. Contribute to the County's Oak Forests Special Fund in an amount of $97,040 (two time the canopy cover area value).

As included in **MM 5.3-20 Off-Site Water Tank Area Oak Woodland Mitigation and Oak Tree Mitigation**, the mitigation, either purchase of mitigation credits or contribution to the County's Oak Forests Special Fund, would occur prior to the issuance of grading permits. Therefore, if the purchase of mitigation credits or contribution to the County's Oak Forests Special Fund does not occur then grading permits would not be issued. If purchase of mitigation credits of oak woodlands from an off-site oak woodland habitat preservation area owned by a third party is implemented, the third party would be responsible for specific

performance standards and actions. Similarly, if contribution to the County's Oak Forests Special Fund is implemented, the County would be responsible for specific performance standards and actions.

Comment 1-44:

Recommendation #3: CDFW recommends that LACDRP recirculate the Draft EIR for more meaningful public review and assessment of mitigation through payment into the Oak Forest Special Fund. Additionally, the LACDRP should recirculate the Draft EIR if the proposed mitigation measure (i.e., fund) would not reduce potential effects to less than significant and new measures must be required [CEQA Guidelines, § 15073.5(b)(2)].

Response 1-44:

Please see *Response 1-43* above. The additional information provided in *Response 1-43* above does not constitute significant new information as defined in Section 15088.5 (a) (1) through (4) and, for this reason, recirculation of the Draft EIR is not required.

Comment 1-45:

Issue: The Project will remove trees and potentially spread material infected with invasive tree diseases, pests, and pathogens.

Specific impacts: The Project may spread invasive tree diseases, pests, and pathogens into areas not currently exposed to these stressors. This could result in expediting the loss of native trees and plant communities. Loss of trees may result in loss of foraging and perching habitat for small mammals, birds, and raptors.

Why impacts would occur: The Project may remove trees that could host diseases and pests. One such pathogen is sudden oak death. Sudden oak death has become the most common cause of mortality of oak (*Quercus genus*) and other native trees (Phytosphere 2015). Mortality rates of oak trees are greater than 50 percent in some areas impacted by sudden oak death (Phytosphere 2012). Tree dieback can have cascading impacts on the habitat and ecosystem, particularly avian distribution and abundance (Monahan and Koenig 2006). Another pest is the polyphagous shot hole borer, which hosts on many native trees species that include box elder (*Acer negundo*), California sycamore (*Platanus racemosa*), willows (*Salix genus*), oaks, cottonwoods (*Populus genus*), and alders (*Alnus genus*) (Calinvasives 2021). Diseases such as sudden oak death can spread via equipment and transport of infected material. These fragments can be spread to new locations if equipment and tools are not disinfected or cleaned before moving to the next work location. Infected material that is transported off site for disposal may expose trees and plant communities to pests and disease. This could result in expediting the loss of oak woodlands, and other native trees and plant communities within and adjacent to a Project site.

Response 1-45:

To address potential impacts associated with the presence of invasive pests and disease in trees that would be removed, the following mitigation measure will be added into the Final EIR:

MM 5.3-27 Pre-construction Tree Pest and Disease Survey.

1) Prior to tree removal, a certified arborist should evaluate trees for infectious tree diseases including but not limited to sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2021; UCANR 2021; Phytosphere Research 2012; UCIPM 2013).

2) If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist should prepare an Infectious Tree Disease Management Plan or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list should provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported from a Project site without first being treated using best available management practices described Infectious Tree Disease Management Plan or list of preventative measures.

3) If possible, all tree material, especially infected tree material, should be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.

Comment 1-46:

Evidence impacts would be significant: The Project may have a substantial adverse effect on sensitive natural communities identified in local or regional plans, policies, and regulations or by the CDFW. The Project may result in a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW that are dependent on woodlands susceptible to invasive tree diseases, pests, and pathogens.

Response 1-46:

MM 5.3-27 Pre-construction Tree Pest and Disease Survey will be added into the Final EIR, as detailed in *Response 1-45*, above.

Comment 1-47:

Mitigation Measure: CDFW recommends that the Draft EIR include a measure to mitigate the spread of invasive pests and diseases by implementing the following:

1) Prior to tree removal, a certified arborist should evaluate trees for infectious tree diseases including but not limited to sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*) (TCD 2021; UCANR 2021; Phytosphere Research 2012; UCIPM 2013).

2) If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist should prepare an Infectious Tree Disease Management Plan or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list should provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported from a Project site without first being treated using best available management practices described Infectious Tree Disease Management Plan or list of preventative measures.
3) If possible, all tree material, especially infected tree material, should be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.

Response 1-47:

MM 5.3-27 Pre-construction Tree Pest and Disease Survey will be added into the Final EIR, as detailed in *Response 1-45*, above.

Comment 1-48:

Lake and Streambed Alteration Agreement. CDFW has received the Notification for Lake and Streambed Alteration (Notification No. LAN-19965-R5) and looks forward to the coordination regarding the Project. CDFW's issuance of an LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from a lead agency for a project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 *et seq*. and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement. To compensate for any on- and off-site impacts to riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures, avoidance of resources, protective measures for downstream resources, on- and/or off-site habitat creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity.

Response 1-48:

The comment states that CDFW has received the Notification for Lake and Streambed Alteration (Notification No. LAN-19965-R5). This comment does not address the information, analysis or conclusions in the Draft EIR and, for this reason, no further response is necessary.

Comment 1-49:

Nesting Birds. Project activities occurring during the bird and raptor breeding and nesting season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. CDFW recommends LACDRP amend MM 5.3-9 to exclude the strikethrough and include the underlined language:

"[…] Within thirty days of ground-disturbing activities associated with construction or grading for the Project that would occur during the nesting/breeding season of native bird species potentially nesting on the site (typically February 15 but as early as January 1 for some raptors through ~~August 31~~ September 15 in the Project region, or as determined by a County-approved biologist), suitable habitat shall be surveyed within seven days prior to initiation of disturbance work by a County-approved biologist to determine if active nests (actively breeding or nesting) of bird species protected by the Migratory Bird Treaty Act and/or the CFGC are present in the disturbance zone or within 300 feet (500 feet for raptors) of the disturbance zone. If initiation of ground-disturbing activities is delayed, then additional pre-disturbance surveys shall be conducted such that no more than seven days will have elapsed between the survey and ground disturbing activities […]"

Response 1-49:

MM 5.3-9 Pre-construction Nesting Bird Survey has been revised to incorporate the revisions suggested in this comment:

MM 5.3-9 **Pre-construction Nesting Bird Survey.** Prior to the issuance of grading permits, the Project Developer shall submit the qualifications of the biologists to the County of Los Angeles Department of Regional Planning for review and approval. Within thirty days of ground disturbing activities associated with construction or grading for the Project that would occur during the nesting/breeding season of native bird species potentially nesting on the site (typically February 15 but as early as January 1 for some raptors through ~~August 31~~ September 15 in the Project region, or as determined by a County-approved biologist), suitable habitat shall be surveyed within seven days prior to initiation of disturbance work by a County-approved biologist to determine if active nests (actively breeding or nesting) of bird species protected by the Migratory Bird Treaty Act and/or the CFGC are present in the disturbance zone or within 300 feet (500 feet for raptors) of the disturbance zone. If initiation of ground-disturbing activities is delayed, then additional pre-disturbance surveys shall be conducted such that no more than seven days will have elapsed between the survey and ground-disturbing activities. […]

Comment 1-50:

Data. CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., California Natural Diversity Database (CNDDB)] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Special status species information should be submitted to the CNDDB by completing the Online Field Survey Form (CDFW 2022b). To submit information on special status native plant populations and sensitive natural communities, the Combined Rapid Assessment and Releve Form should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFW 2022c).

LACDRP should ensure all pertinent data, such as locations of slender mariposa lily, has been properly submitted, with all applicable data fields filled out, prior to finalizing/adopting the Project's environmental document. The data entry should also list pending development as a threat and then update this occurrence after impacts have occurred. LACDRP should provide CDFW with confirmation of data submittal.

Response 1-50:

LACDRP will comply with CEQA policies and report biological data as requested in this comment.

Comment 1-51:

Mitigation and Monitoring Reporting Plan. CDFW recommends LACDRP update the Project's proposed Biological Mitigation Measures and condition the environmental document to include mitigation measures recommended in this letter. CDFW provides comments to assist Lead Agencies in developing mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). LACDRP is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided LACDRP with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (MMRP; Attachment A).

Response 1-51:

The mitigation measures and recommendations in this letter are addressed in *Responses 1-1* through *1-83*. A final Mitigation and Monitoring Reporting Program incorporating the new and revised mitigation measures included in the responses will be included as part of the Final EIR.

Comment 1-52:

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required for the underlying Project approval to be operative, vested, and final (Cal. Code Regs., tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

Response 1-52:

The required filing fee will be paid at the time a Notice of Determination is filed for the Project.

Comment 1-53:

We appreciate the opportunity to comment on the Project to assist LACDRP in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that LACDRP has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)]. If you have any questions or

comments regarding this letter, please contact Felicia Silva, Environmental Scientist, at (562) 292-8105 or by email at Felicia.Silva@wildlife.ca.gov.

Response 1-53:

These responses were provided to the CDFW as required by Section 15073(e) of the CEQA Guidelines.

Comment 1-54:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
REC-1-Mountain lion Impact Assessment	LACDRP should evaluate the mountain lion territory size and use of habitat within and surrounding the Project vicinity. LACDRP should analyze the effects of increased human presence and area of anthropogenic influence that will now be in on mountain lion habitat, and how it may impact mountain lion behavior, reproductive viability, and overall survival success. Based on these known anthropogenic impacts on mountain lions, CDFW also recommends LACDRP provide compensatory mitigation for impacts to mountain lion. The DEIR should justify how the proposed compensatory mitigation would reduce the impacts of the Project to less than significant. CDFW recommends that the LACDRP recirculate the DEIR for more meaningful public review and assessment of the LACDRP's analysis and subsequent mitigation for mountain lion. Additionally, the LACDRP should recirculate the DEIR if the proposed mitigation measures would not reduce potential effects to less than significant and new measures must be required [CEQA Guidelines, § 15088.5(a)(1)].	Prior to finalizing EIR	LACDRP

Response 1-54:

Please see *Response 1-9*, above, regarding this recommendation.

Comment 1-55:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-1-Impacts to Mountain lion – Replacement Habitat	In addition to the 37.9 acres in the Open Space Dedication Area, an additional 88.6 acres of replacement habitat shall be set aside to have a no net loss of 126.5 acres for wildlife movement. The replacement habitat shall be located as near to the Project site as possible. The Project Applicant shall consult and collaborate with CDFW to conserve areas beneficial to the southern California mountain lion population that may improve chances of survival and	Prior to issuance of Grading permits/Project construction and activities	LACDRP/Project Applicant

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
	reproduction of mountain lions in the face of climate change. Those 37.9 acres of mitigation lands shall be protected in perpetuity under a conservation easement dedicated to a local land conservancy or other appropriate entity that has been approved to hold and manage mitigation lands pursuant to Assembly Bill 1094 (2012). An appropriate non-wasting endowment shall be provided for the long-term management of mitigation lands. A conservation easement and endowment funds shall be fully acquired, established, transferred, or otherwise executed prior to implementing Project-related ground-disturbing activities and prior to LACDRP's issuance of grading permits.		

Response 1-55:

Please see *Response 1-10*, above, regarding this recommended mitigation measure.

Comment 1-56:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-2-Impacts to Mountain lion - Surveys	Due to habitat in the Project vicinity, within one year prior to Project implementation that includes site preparation, equipment staging, and mobilization, a CDFW-approved biologist knowledgeable of mountain lion species ecology should survey areas that may provide habitat for mountain lion to determine presence/absence and potential for natal dens within a half mile of the Project site. Surveys should be conducted when the species is most likely to be detected, during crepuscular periods at dawn and dusk. Survey results including negative findings shall be submitted to CDFW prior to initiation of Project activities. The survey report shall include a map of potential denning sites. The survey report shall include measures to avoid impacts mountain lions that may be in the area as well as dens and cubs, if necessary.	One year prior to Project implementation	Project Applicant

Response 1-56:

Please see *Response 1-11*, above, regarding this recommended mitigation measure.

Comment 1-57:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-3-Impacts to Mountain lion – Avoiding Natal Dens	If potential habitat for natal dens is identified, impacts to mountain lions shall be fully avoided, especially during spring, to protect vulnerable cubs. Two weeks prior to Project implementation, and once a week during construction activities, a CDFW-approved biologist shall conduct a survey for mountain lion natal dens. The survey area shall include the construction footprint and the area within 2,000 feet (or the limits of the property line) of the Project disturbance boundaries. CDFW shall be notified within 24 hours upon location of a natal den. If an active natal den is located during construction activities, all work shall cease. No work shall occur within a 2,000-foot buffer from a natal den. A qualified biologist shall notify CDFW to determine the appropriate course of action. CDFW shall also be consulted to determine an appropriate setback from the natal den that would not adversely affect the successful rearing of the cubs. No construction activities or human intrusion shall occur within the established setback until mountain lion cubs have been successfully reared; the mountain lions have left the area; or as determined in consultation with CDFW.	Two weeks prior to Project Implementation and once a week during construction activities	Project Applicant

Response 1-57:

Please see *Response 1-12*, above, regarding this recommended mitigation measure.

Comment 1-58:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-4-Impacts to Mountain lion – Incidental Take Permit	If "take" or adverse impacts to mountain lion cannot be avoided either during Project construction or over the life of the Project, Project Applicant shall consult CDFW to determine if a CESA ITP is required.	Prior to Project construction and activities	Project Applicant

Response 1-58:

Please see *Response 1-13*, above, regarding this recommended mitigation measure.

Comment 1-59:

Biological Resources (BIO)

Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-5-Impacts to Mountain lion – Signage	The Project Applicant shall install signage and provide educational materials to residents and trail users to keep aware of the impacts that human disturbance brings to the surrounding open spaces	During/After Project construction and activities	Project Applicant

Response 1-59:

Please see *Response 1-14*, above, regarding this recommended mitigation measure.

Comment 1-60:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-6-Impacts to Mountain lion – Signage	The Project Applicant shall install appropriate public information signage in the residential area and along the trail to: 1) educate and inform the public about wildlife, especially mountain lions, present in the area; 2) advise on proper avoidance measures to reduce human-wildlife conflicts; 3) advise on proper use of open space trails in a manner respectful to wildlife; and 4) provide local contact information to report injured or dead wildlife. Signage shall be written in the language(s) understandable to all those likely to recreate and use the trails. Signage shall not be made of materials harmful to wildlife such as spikes or glass. The Project Applicant shall provide a long-term maintenance plan to repair and replace the signs.	During/After Project construction and activities	Project Applicant

Response 1-60:

Please see *Response 1-14*, above, regarding this recommended mitigation measure.

Comment 1-61:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-7-Impacts to Mountain lion – Restrict Certain Activities	The Project Applicant shall restrict certain types of activities allowed in some areas, such as prohibiting dogs or restricting use of trails near mountain lion habitat. Pets shall be kept on leash and on trails at all times. Hikers shall be encouraged to clean up after their dogs and discourage animal waste as it tends to lead to wildlife avoidance.	After Project construction and activities Project's lifetime	Project Applicant

Response 1-61:

Please see *Response 1-15*, above, regarding this recommended mitigation measure.

Comment 1-62:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-8-Impacts to Mountain lion – Restrict Certain Activities	Trash receptacles shall be placed in areas to avoid creating an unnatural food source that may attract nuisance wildlife and to minimize waste in core habitat areas.	After Project construction and activities Project's lifetime	Project Applicant

Response 1-62:

Please see *Response 1-16*, above, regarding this recommended mitigation measure.

Comment 1-63:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-9-Impacts to Mountain lion – Prohibit Use of Rodenticides	Rodenticides and second-generation anticoagulant rodenticides shall be used.	After Project construction and activities Project's lifetime	Project Applicant

Response 1-63:

Please see *Response 1-17*, above, regarding this recommended mitigation measure.

Comment 1-64:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-10-Impacts on California Species of Special Concern-Relocation Plan	A qualified biologist shall prepare a species-specific list (or plan) of proper handling and relocation protocols and a map of suitable and safe relocation areas. A relocation plan shall be prepared prior to implementing any Project-related ground-disturbing activities and vegetation removal.	Prior to Project-related ground-disturbing activities and vegetation removal	Project Applicant

Response 1-64:

Please see *Response 1-21*, above, regarding this recommended mitigation measure.

Comment 1-65:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-11- Impacts on California Species of Special Concern – Replacement Habitat	Compensatory mitigation shall be provided for temporary and/or permanent loss of any habitat supporting SSC. Compensatory mitigation shall be provided within the Project site. Compensatory mitigation shall be provided at no less than 2:1. Mitigation shall provide upland and/or aquatic habitat (depending on the species), refugia, and habitat structures that support that species (e.g., woody material, rocks, brush piles, pools, burrows). Any proposed mitigation area/plan shall include a discussion on the territory size; nesting, breeding, foraging, and refuge, locations, invasive, non-native plant and wildlife species present, food availability, and how all life cycle functions will be mitigated. Mitigation for impacts to an SSC shall adhere to CDFW and/or USFWS established protocol/guidelines if available.	Prior to/During project ground-disturbing activities	Project Applicant

Response 1-65:

Please see *Response 1-22*, above, regarding this recommended mitigation measure.

Comment 1-66:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-12- Impacts on Oak trees – Compensatory Mitigation	A minimum mitigation of 3:1 shall be provided for impacts to coast live oak trees.	Prior to Project construction and activities	Project Applicant

Response 1-66:

Please see *Response 1-27*, above, regarding this recommended mitigation measure.

Comment 1-67:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-13- Impacts on Oak trees – Compensatory Mitigation	Replacement oak trees shall not be planted within any fuel modification zone. The Project Applicant shall plant oak trees in the open space area in the northwest corner of the VTTM site.	Prior to Project construction and activities	Project Applicant

Response 1-67:

Please see *Response 1-28*, above, regarding this recommended mitigation measure.

Comment 1-68:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-14-Impacts on Oak trees – Compensatory Mitigation	Replacement oak trees shall be of the same species and come from nursery stock grown from locally sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they were planted.	Prior to Project construction and activities	Project Applicant

Response 1-68:

Please see *Response 1-29*, above, regarding this recommended mitigation measure.

Comment 1-69:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
REC-2-Impacts on Slender Mariposa Lily	CDFW recommends LACDRP require the Project Applicant to conduct an assessment of the effects of increased slender mariposa lily individuals and transplantation activities may have on vegetation and wildlife in situ of the Open Space Dedication Area. The DEIR should justify how the proposed compensatory mitigation would reduce the impacts of the Project to less than significant and not cause secondary impacts.	Prior to Project construction and activities	Project Applicant

Response 1-69:

Please see *Response 1-32*, above, regarding this recommendation.

Comment 1-70:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
REC-3-Impacts on Slender Mariposa Lily	CDFW recommends LACDRP recirculate the Project's environmental document after the assessment to disclose information on the Open Space Dedication Area and potential impacts on those biological resources within that area considering the current mitigation for slender mariposa lily. Per CEQA Guidelines section 15088.5, "a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of	Prior to Project construction and activities	Project Applicant

	the availability of the draft EIR for public review under Section 15087 but before certification."		

Response 1-70:

Please see *Response 1-33*, above, regarding this recommendation.

Comment 1-71:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-15-Impacts on Slender Mariposa Lily-Compensatory Mitigation	CDFW recommends mitigation should also include additional offsite, in-kind preservation within the County at the 10:1 ratio proposed, in the event of establishment failure to prevent a net loss of slender mariposa lily.	Prior to Project construction and activities	Project Applicant

Response 1-71:

Please see *Response 1-34*, above, regarding this recommended mitigation measure.

Comment 1-72:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
REC-4-Impacts on Palmer's Goldenbush Scrub	CDFW recommends LACDRP require the Project Applicant to conduct an assessment of each mitigation option and associated activities presented in MM 5,3-17 and the impacts they may have on vegetation and wildlife in situ of proposed areas in the VTTM site as well as the Open Space Dedication Area. The DEIR should justify how the proposed compensatory mitigation would reduce the impacts of the Project to less than significant and not cause secondary impacts.	Prior to Project construction and activities	Project Applicant

Response 1-72:

Please see *Response 1-37*, above, regarding this recommendation.

Comment 1-73:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
REC-5-Impacts on Palmer's	CDFW recommends LACDRP recirculate the Project's environmental document after the assessment to disclose information on the VTTM site and Open Space Dedication	Prior to Project	Project Applicant

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
Goldenbush Scrub	Area and potential impacts on those biological resources within that area considering the current mitigation for slender mariposa lily. Per CEQA Guidelines section 15088.5, "a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification."	construction and activities	

Response 1-73:

Please see *Response 1-38*, above, regarding this recommendation.

Comment 1-74:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
REC-6-Impacts on Palmer's Goldenbush scrub	If the native scrub alliances have an association with Palmer's goldenbush scrub in areas of the Project site, there should be coordination with CDFW's Vegetation Classification and Mapping Program (VegCAMP) to map them according to State-wide standards.	Prior to Project construction and activities	Project Applicant

Response 1-74:

Please see *Response 1-39*, above, regarding this recommendation.

Comment 1-75:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-16-Impacts on Palmer's Goldenbush scrub	The DEIR will determine which (if any) mitigation bank managed by Land Veritas would be appropriate for the creation/enhancement of Palmer's goldenbush scrub. The bank shall have an appropriate habitat environment for Palmer's goldenbush scrub. The bank shall also be within Los Angeles County and ideally, within the vicinity of the Project site.	Prior to Project construction and activities	Project Applicant

Response 1-75:

Please see *Response 1-40*, above, regarding this recommended mitigation measure.

Comment 1-76:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
REC-7-Oak Forest Special Fund	LACDRP should revise the EIR to provide the following information pertaining to payment of in-lieu fees to mitigate for the Project's impact on oak trees: 1) How the Oak Forest Preservation Fund is designed to (and will) mitigate the effects at issue at a level meaningful for purposes of CEQA; 2) Why the in-lieu fee is appropriate for mitigating the cumulative loss of biological resources; 3) Why the in-lieu fee is sufficient to purchase land or credits at a mitigation bank; 4) Where the Project Applicant may acquire land or purchase credits at a mitigation bank; 5) When the Project Applicant would use the in-lieu fee; and, 6) How the in-lieu fee would be adequate such that no impacts would occur as a result of the Project. The EIR should provide any technical data, maps, plot plans, diagrams, and similar relevant information in addressing these concerns (CEQA Guidelines, § 15147).	Prior to finalizing EIR	LACDRP

Response 1-76:

Please see *Response 1-42*, above, regarding this recommendation.

Comment 1-77:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
REC-8- Oak Forest Special Fund	The EIR should provide a discussion describing how the LACDRP intends to commit the Project Applicant to mitigation via the in-lieu fee. For example, the EIR should provide specifics as to when payment would be required, what mechanisms would LACDRP implement to ensure the fee is paid, and when LACDRP would use the project's payment for mitigation. Also, the EIR should provide specific performance standards and actions to achieve those performance standards.	Prior to finalizing EIR	LACDRP

Response 1-77:

Please see *Response 1-43*, above, regarding this recommendation.

Comment 1-78:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
REC-9- Oak Forest Special Fund	LACDRP should recirculate the Project's CEQA document for more meaningful public review and assessment of mitigation through payment of in-lie feeds. Additionally, LACDRP should recirculate the Project's CEQA document if the proposed mitigation measure would not reduce potential effects to less than significant and new measures must be required [CEQA Guidelines, § 15073.5(b)(2)].	Prior to finalizing EIR	LACDRP

Response 1-78:

Please see *Response 1-44*, above, regarding this recommendation.

Comment 1-79:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-17- Tree Pests, Pathogens, and Disease	Prior to tree removal, a certified arborist shall evaluate trees for infectious tree diseases including but not limited to sudden oak death (*Phytophthora ramorum*), thousand canker fungus (*Geosmithia morbida*), polyphagous shot hole borer (*Euwallacea* spp.), and goldspotted oak borer (*Agrilus auroguttatus*). If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist shall prepare an Infectious Tree Disease Management Plan or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list should provide measures relevant for each tree pest or disease observed.	Prior to Project construction and activities	Project Applicant

Response 1-79:

Please see *Response 1-47*, above, regarding this recommended mitigation measure.

Comment 1-80:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
MM-BIO-18- Tree Pests, Pathogens, and Disease	To avoid the spread of infectious tree pests and diseases, infected trees shall not be transported from the Project site without first being treated using best available management practices described Infectious Tree Disease Management Plan or list of preventative measures. If possible, all tree material, especially infected tree material, shall be left on	During Project construction and activities	Project Applicant

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
	site. Pruning and power tools shall be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.		

Response 1-80:

Please see *Response 1-47*, above, regarding this recommended mitigation measure.

Comment 1-81:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
REC-10-Nesting Birds	Project activities occurring during the bird and raptor breeding and nesting season could result in the incidental loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. CDFW recommends LACDRP amend MM 5.3-9 to exclude the ~~strikethrough~~ and include the <u>underlined</u> language: "[…] Within thirty days of ground-disturbing activities associated with construction or grading for the Project that would occur during the nesting/breeding season of native bird species potentially nesting on the site (typically February 15 <u>but as early as January 1 for some raptors</u> through ~~August 31~~ <u>September 15</u> in the Project region, or as determined by a County-approved biologist), suitable habitat shall be surveyed within seven days prior to initiation of disturbance work by a County-approved biologist to determine if active nests (actively breeding or nesting) of bird species protected by the Migratory Bird Treaty Act and/or the CFGC are present in the disturbance zone or within 300 feet (500 feet for raptors) of the disturbance zone. If initiation of ground-disturbing activities is delayed, then additional pre-disturbance surveys shall be conducted such that no more than seven days will have elapsed between the survey and ground-disturbing activities […]"	Prior to finalizing EIR	LACDRP

Response 1-81:

Please see *Response 1-49*, above, regarding this recommendation.

Comment 1-82:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
REC-11-Data	LACDRP should ensure sensitive and special status species data has been properly submitted to the California Natural Diversity Database with all data fields applicable filled out. To submit information on special status native plant populations and sensitive natural communities, the Combined Rapid Assessment and Releve Form should be completed and submitted to CDFW's Vegetation Classification and Mapping Program. Confirmation of data submittal should be provided to CDFW.	Prior to finalizing EIR	LACDRP

Response 1-82:

Please see Response 1-50, above, regarding this recommendation.

Comment 1-83:

Biological Resources (BIO)			
Mitigation Measure (MM) or Recommendation (REC)		Timing	Responsible Party
REC-12-Mitigation and Monitoring Reporting Plan	LACDRP should update the Project's proposed Biological Resources Mitigation Measures and condition the environmental document to include mitigation measures recommended in this letter. LACDRP is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures.	Prior to finalizing EIR	LACDRP

Response 1-83:

Please see *Response 1-51*, above, regarding this recommendation.

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, Governor

DEPARTMENT OF TRANSPORTATION
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100 S. MAIN STREET, MS 16
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Making Conservation
a California Way of Life

January 5, 2022

Jodie Sackett
Los Angeles County Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

RE: Sterling Ranch Estates Project
SCH # 2019080092
Vic. LA-05/PM R56.606, LA-126/PM R2.36
GTS # LA-2019-03764-DEIR

Dear Jodie Sackett:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. Sterling Gateway, LP (the Applicant) proposes the Project, consisting of a 113.9-gross acre VTTM site and approximately 50.5 acres of related off-site components within a total of approximately 164.4 acres. The Project would include the construction and operation of 222 single-family residential lots. Approximately 21,000 sq. ft. of neighborhood commercial uses are planned on approximately 2.5 acres within the southwestern-most lot within the VTTM site. Two parks and trails for residents would be provided within the VTTM site. The Project site also includes off-site components proposed within areas referred to herein as the Off-Site Improvement Area and Open Space Dedication Area. 2-1

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information: 2-2

http://opr.ca.gov/ceqa/updates/guidelines/

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular 2-3

capacity, this project should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

2-3

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

2-4

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf

2-5

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

2-6

Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared on December 18, 2020. You can review these resources as a reference at the following links for all future projects:

https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf.

2-7

https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf.

When a potential safety impact is identified, Caltrans encourages lead agencies to prepare traffic safety impact analysis at the State facilities for this development in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

Caltrans concurs that according to the VMT Impact Analysis, the residential component of the project will have a significant and unavoidable transportation impact in the North County area. The retail component of the project is less than 50,000 square feet and therefore is presumed to have a less than significant transportation impact. The community park component of the project generates less than 110 trips per day and therefore is presumed to have a less than significant transportation impact.

We concur the following Mitigation of Project's Transportation Impact:

1) MM-1: The project shall provide community wireless internet connection at the commercial retail and park sites to promote telecommuting. The retail and community park components shall be developed.

2) MM-2: The project shall implement traffic calming measures at appropriate locations to develop low speed roadways for on-site streets and intersections, and encourage bicycle and pedestrian trips, prior to final map recordation.

3) MM-3: The project shall implement a Class III bicycle facility on Del Valle Road from Hunstock Street to the project boundaries prior to final map recordation.

4) MM-4: The project shall provide amenities to support the use Neighborhood Electric Vehicles (NEV) within the project boundaries prior to final map recordation. The NEV-related amenities shall include NEV parking and charging stations at the commercial retail center and community park.

5) MM-5: The project shall relocate an existing bus stop to a central location adjacent to]retail and park use to increase transit coverage. The new bus stop shall include amenities to facilitate transit use such as shade structures, benches and bike racks.

In addition, Caltrans also concurs the Table 3-5 Mitigation Measures for Cumulative Impacts in the Sterling Ranch Estates (VTTM 60257) Traffic Impact Analysis prepared in July 2019. The fair share contribution collected by the Lead Agency to implement the mitigation measures should be adjusted to accommodate future inflation:

2-7
2-8
2-9
2-10
2-11

Intersection #1, Chiquito Canyon Road & SR-126, Intersection modification to provide two southbound left-turn lanes, three southbound through lanes, one southbound right-turn lane (for 2 SB Left, 3 SB Through and 1 SB Right), two westbound left-turn lanes, three westbound through lanes, one westbound right-turn lane (for 2 WB Left, 3 WB Through and 1 WB Right), two northbound left-turn lanes, two northbound through lanes, two northbound right-turn lanes (for 2 NB Left, 2 NB Through and 2 NB Right), two eastbound left-turn lanes, three eastbound through lanes, one eastbound right-turn lane (for 2 EB Left, 3 EB Through and 1 EB Right). Install traffic signal. Project Traffic Share is calculated 1.2%. This % should be the worse of AM or PM impact, not combined.

Intersection #6, The Old Road & I-5 SB Ramps (at Sedona Way), Intersection modification to add one southbound left-turn lane (for 2 SB Left and 2 SB Through). Project Traffic Share is calculated 0.6%. This % should be the worse of AM or PM impact, not combined. 2-11

Intersection #14, Wolcott Way & SR-126, Intersection modification to provide two southbound left-turn lanes, one southbound through lane, one southbound right-turn lane (for 2 SB Left, 1 SB Through and 1 SB Right), two westbound left-turn lanes, four westbound through lanes, one westbound right-turn lane (for 2 WB Left, 4 WB Through and 1 WB Right), one northbound left-turn lanes, one northbound through lanes, two northbound right-turn lanes (for 1 NB Left, 1 NB Through and 2 NB Right), two eastbound left-turn lanes, four eastbound through lanes, one eastbound right-turn lane (for 2 EB Left, 4 EB Through and 1 EB Right). Project Traffic Share is calculated 0.9%. This % should be the worse of AM or PM impact, not combined.

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications. 2-12

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods. 2-13

If you have any questions, please feel free to contact Mr. Alan Lin, the project coordinator, at (213) 269-1124 and refer to GTS # LA-2019-03764AL-DEIR. 2-14

Sincerely,

Miya Edmonson

MIYA EDMONSON
IGR/CEQA Branch Chief

email: State Clearinghouse

COMMENT LETTER NO. 2:

Miya Edmonson
IGR/CEQA Branch Chief
California State Transportation Agency
Department of Transportation
District 7
100 S. Main Street, MS 16
Los Angeles, California 90012

Comment 2-1:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. Sterling Gateway, LP (the Applicant) proposes the Project, consisting of a 113.9-gross acre VTTM site and approximately 50.5 acres of related off-site components within a total of approximately 164.4 acres. The Project would include the construction and operation of 222 single-family residential lots. Approximately 21,000 sq. ft. of neighborhood commercial uses are planned on approximately 2.5 acres within the southwestern-most lot within the VTTM site. Two parks and trails for residents would be provided within the VTTM site. The Project site also includes off-site components proposed within areas referred to herein as the Off-Site Improvement Area and Open Space Dedication Area.

Response 2-1:

This comment presents a summary description of the Project. This comment does not address the information, analysis or conclusions in the Draft EIR and, for this reason, no further response is necessary.

Comment 2-2:

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

http://opr.ca.gov/ceqa/updates/guidelines/

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

Response 2-2:

This comment states the mission of Caltrans and indicates that Vehicle Miles Traveled (VMT) is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020. This is noted in Section 5.15: Transportation of the Draft EIR. Because the County's environmental review of this Project

was initiated prior to July 1, 2020, Section 5.15 of the Draft EIR evaluates the Project's potential VMT impacts and also potential effects on the capacity of roadways, highways, and the transit system.

A VMT analysis dated November 2020 is included as Appendix M.1: VMT Impact Analysis Memorandum of the Draft EIR and was approved by Los Angeles Department of Public Works (LADPW) in February 2021. Additionally, a supporting Traffic Impact Analysis (TIA) dated July 2019 is included as Appendix M.2: Traffic Impact Analysis of the Draft EIR and was approved by LADPW on August 7, 2019.

Comment 2-3:

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, this project should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Response 2-3:

The Draft EIR identifies the following mitigation measures to promote both bicycling and public transit use consistent with the recommendation in this comment:

3) **MM-3**: The Project shall implement a Class III bicycle facility on Del Valle Road from Hunstock Street to the project boundaries prior to final map recordation; and

5) **MM-5**: The Project shall relocate an existing bus stop to a central location adjacent to retail and park use to increase transit coverage. The new bus stop shall include amenities to facilitate transit use such as shade structures, benches and bike racks.

The streets within the Project and the proposed improvements to Del Valle Road have been designed consistent with applicable County standards to provide access for all modes of travel. The proposed improvements would allow for vehicle, bicycle, and pedestrian travel. These include graded shoulders, bicycle lane markings, street paving, and protected crosswalks for park access. The final design of the proposed improvements would occur during the design phase of the Project.

Comment 2-4:

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes

reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

Response 2-4:

The streets within the Project and the proposed improvements to Del Valle Road have been designed consistent with applicable County standards to provide access for all modes of travel. The proposed improvements would allow for vehicle, bicycle, and pedestrian travel. These include graded shoulders, bicycle lane markings, street paving, and protected crosswalks for park access. The final design of the proposed improvements would occur during the design phase of the Project. The Draft EIR identifies the following mitigation measure requiring the incorporation of traffic calming measures into the final design the Project, consistent with the recommendation in this comment:

2) **MM-2**: The Project shall implement traffic calming measures at appropriate locations to develop low speed roadways for on-site streets and intersections, and encourage bicycle and pedestrian trips, prior to final map recordation.

Comment 2-5:

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf

Response 2-5:

The County evaluated a wide range of potential TDM strategies and has required as mitigation measures TDM strategies that are applicable to the Project based on location of the Project and the proposed land uses.

2) **MM-2**: The Project shall implement traffic calming measures at appropriate locations to develop low speed roadways for on-site streets and intersections, and encourage bicycle and pedestrian trips, prior to final map recordation.

3) **MM-3**: The Project shall implement a Class III bicycle facility on Del Valle Road from Hunstock Street to the project boundaries prior to final map recordation; and

4) **MM-5**: The Project shall relocate an existing bus stop to a central location adjacent to retail and park use to increase transit coverage. The new bus stop shall include amenities to facilitate transit use such as shade structures, benches and bike racks.

Comment 2-6:

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures report by the California Air Pollution Control Officers Association* (CAPCOA), which is available online at:

http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9- 14-Final.pdf

Response 2-6:

As analyzed in Section 5.7: Greenhouse Gas Emissions, of the Draft EIR, impacts related to direct and indirect emissions of greenhouse gas emissions would be less than significant. Construction assumptions used in the analysis of GHG emissions conservatively assume that the Project would be constructed with the most intensive activities occurring on a daily basis. Construction emissions were amortized over the 30-year lifetime of the Project, as recommended by the South Coast Air Quality Management District (SCAQMD), so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. Total GHG emissions from the construction activities are forecast to be 7,603 MTCO2e. The total GHG emissions were amortized over a 30-year Project lifetime and forecast to be 253 MTCO2e per year. The greenhouse gas emissions estimated from operation of the Project is estimated to be 1,580 MTCO2e per year. The Project would incorporate energy and water efficiency design features to enhance efficiency in all aspects of the life cycle of the Project's buildings based on the latest CALGreen and Title 24 Building Energy Efficiency standards, as amended by the County, for new residential construction and commercial uses; thereby further reducing the Project's GHG emissions. In the absence of any adopted, numeric threshold, the County evaluates the significance of a project by considering whether the project conflicts with applicable land use designations and regulations and actions identified in the adopted Community Climate Action Plan (CCAP). As discussed in the Draft EIR, the Project would be consistent with existing land use and zoning designations and development of the Project is included in regional growth forecasts.

As discussed in the Draft EIR, the Project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. The County's adopted CCAP establishes a GHG reduction target that is consistent with AB 32 and the draft CAP provides further actions consistent with SB 32 and EO B-55-18. The Project's significance with respect to GHG emissions is evaluated based on its consistency with applicable GHG reduction actions in the County's adopted CCAP and draft CAP. The Project is consistent with the applicable actions in the CCAP as it would implement many of the actions and policies the County has outlined as important to reducing GHG emissions in the unincorporated areas,

see Table 5.7-11: Consistency with the County Community Climate Action Plan of the Draft EIR, page 5.7-40. In accordance with CEQA Guidelines Section 15183.5, which specifies that CEQA project evaluation of GHG emissions can "tier off" a programmatic analysis of GHG emissions, such as the adopted CCAP and draft CAP, the Project would result in less than significant GHG emissions.

Cumulative impacts with respect to GHG emissions would be less than significant. The Project is consistent with existing land use and zone designations and would be consistent with applicable County CCAP actions, County draft CAP actions, the Los Angeles County Green Building Program, SCAG's SCS policies, and would incorporate applicable mitigation measures set forth in the 2016—2040 RTP/SCS, 2020—2045 RTP/SCS, and the SCVAP 2012 Program EIRs to reduce GHG emissions. As the SB 375 CEQA streamlining requirements have been met, additional CEQA analysis of cumulative GHG impacts from cars and light-duty trucks is not required pursuant to the provisions set forth in SB 375 and Public Resources Code Section 21159.28. The Project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions in 2020, 2030, and/or 2050. The Project's contribution to cumulative impact of GHG emissions would not be cumulatively considerable and would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. As with the Project, the related projects would be required to comply with all applicable plans, policies, or regulations, including the County's CCAP, CAP, Green Building Program, and AB32, which are intended to reduce GHG emissions.

The Project would conform with current County zoning standards requiring the installation of electric vehicle (EV) charging stations. The proposed commercial uses would be required to provide EV charging facilities per CALGreen requirements, and all residential units would have solar and the capability for EV charging. The Project would comply with Title 24 and the energy efficiency measures in the County's Green Building Ordinance, which require the Project's residential buildings to install solar photovoltaic (PV) systems, residential buildings to have the capability for EV charging, and the installation of EV charging stations for the commercial use. The Project would also include energy efficient appliances per the 2019 California Building Standard Codes.

Comment 2-7:

Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared on December 18, 2020. You can review these resources as a reference at the following links for all future projects:

https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf

https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf.

Response 2-7:

The County evaluated a wide range of potential TDM strategies and has required as mitigation measures TDM strategies that are applicable to the Project based on location of the Project and the proposed land uses.

The Caltrans TISG discusses the department's focus on GHG and VMT reduction and includes Caltrans recommendations for use of VMT thresholds of significance for evaluation of land use projects (i.e., a target of 15% below existing city or regional VMT per capita) recommended by the State Office of Planning and Research (OPR). The TISG also recognizes that the lead agency has discretion to choose the most appropriate methodology to evaluate a project's VMT.

The VMT analysis in the Draft EIR follows the County's guidelines and was reviewed and approved by the County as being consistent with the County's guidelines. The Draft EIR analysis is based on methodologies consistent with the OPR recommendations and uses the County's thresholds of significance that are 16.8% lower than the regional VMT per capita. Therefore, the VMT analysis in the Draft EIR is consistent with the Caltrans TISG recommendations because the VMT analysis follows the lead agency's requirements and is slightly more conservative than the OPR recommended thresholds of significance referenced in the TISG.

Comment 2-8:

When a potential safety impact is identified, Caltrans encourages lead agencies to prepare traffic safety impact analysis at the State facilities for this development in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

Response 2-8:

The Draft EIR did not identify any potential traffic-related safety impacts for the Project. As discussed on page 5.15-46 of the Draft EIR, the design of the streets within the Project and the proposed improvements to Del Valle Road meet all applicable County road design standards.

Comment 2-9:

Caltrans concurs that according to the VMT Impact Analysis, the residential component of the project will have a significant and unavoidable transportation impact in the North County area. The retail component of the project is less than 50,000 square feet and therefore is presumed to have a less than significant transportation impact. The community park component of the project generates less than 110 trips per day and therefore is presumed to have a less than significant transportation impact.

Response 2-9:

The concurrence of Caltrans with the conclusions of the County-approved VMT analysis in the Draft EIR is noted.

Comment 2-10:

We concur the following Mitigation of Project's Transportation Impact:

5) **MM-1**: The project shall provide community wireless internet connection at the commercial retail and park sites to promote telecommuting. The retail and community park components shall be developed.

6) **MM-2**: The project shall implement traffic calming measures at appropriate locations to develop low speed roadways for on-site streets and intersections, and encourage bicycle and pedestrian trips, prior to final map recordation.

7) **MM-3**: The project shall implement a Class III bicycle facility on Del Valle Road from Hunstock Street to the project boundaries prior to final map recordation.

8) **MM-4**: The project shall provide amenities to support the use of Neighborhood Electric Vehicles (NEV) within the project boundaries prior to final map recordation. The NEV related amenities shall include NEV parking and charging stations at the commercial retail center and community park.

9) **MM-5**: The project shall relocate an existing bus stop to a central location adjacent to retail and park use to increase transit coverage. The new bus stop shall include amenities to facilitate transit use such as shade structures, benches and bike racks.

Response 2-10:

The concurrence of Caltrans with the mitigation measures identified in the Final EIR to mitigate the transportation impacts of the Project is noted. These mitigation measures for the Project are included in **Section 5.0: Mitigation Monitoring and Reporting Program** of this Final EIR.

Comment 2-11:

In addition, Caltrans also concurs the Table 3-5 Mitigation Measures for Cumulative Impacts in the Sterling Ranch Estates (VTTM 60257) Traffic Impact Analysis prepared in July 2019. The fair share contribution collected by the Lead Agency to implement the mitigation measures should be adjusted to accommodate future inflation:

Intersection #1, Chiquito Canyon Road & SR-126, Intersection modification to provide two southbound left-turn lanes, three southbound through lanes, one southbound rightturn lane (for 2 SB Left, 3 SB Through and 1 SB Right), two westbound left-turn lanes, three westbound through lanes, one westbound right-turn lane (for 2 WB Left, 3 WB Through and 1 WB Right), two northbound left-turn lanes, two

northbound through lanes, two northbound right-turn lanes (for 2 NB Left, 2 NB Through and 2 NB Right), two eastbound left-turn lanes, three eastbound through lanes, one eastbound right-turn lane (for 2 EB Left, 3 EB Through and 1 EB Right). Install traffic signal. Project Traffic Share is calculated 1.2%. This % should be the worst of AM or PM impact, not combined.

Intersection #6, The Old Road & I-5 SB Ramps (at Sedona Way), Intersection modification to add one southbound left-turn lane (for 2 SB Left and 2 SB Through). Project Traffic Share is calculated 0.6%. This % should be the worst of AM or PM impact, not combined.

Intersection #14, Wolcott Way & SR-126, Intersection modification to provide two southbound left-turn lanes, one southbound through lane, one southbound right-turn lane (for 2 SB Left, 1 SB Through and 1 SB Right), two westbound left-turn lanes, four westbound through lanes, one westbound right-turn lane (for 2 WB Left, 4 WB Through and 1 WB Right), one northbound left-turn lanes, one northbound through lanes, two northbound right-turn lanes (for 1 NB Left, 1 NB Through and 2 NB Right), two eastbound left-turn lanes, four eastbound through lanes, one eastbound right-turn lane (for 2 EB Left, 4 EB Through and 1 EB Right). Project Traffic Share is calculated 0.9%. This % should be the worst of AM or PM impact, not combined.

Response 2-11:

The concurrence of Caltrans with the mitigation measures for cumulative transportation impacts is noted. These mitigation measures for the Project are included in **Section 5.0: Mitigation Monitoring and Reporting Program** of this Final EIR.

Please note that the actual amount of fair-share payments made for the Project will be determined by the County and may include an adjustment to accommodate future inflation as deemed appropriate by the County at that time.

Comment 2-12:

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.

Response 2-12:

The Project, including the mitigation measures for transportation impacts, does not include improvements in State rights-of-way. This comment does not address the information, analysis or conclusions in the Draft EIR and, for this reason, no further response is necessary.

Comment 2-13:

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

Response 2-13:

This comment is noted. The Project will obtain a Caltrans transportation permit in the event any oversized-transport vehicles associated with construction of the Project will travel on State highways and these trips will be scheduled to the non-peak commute periods. As discussed in Section 5.15: Transportation of the Draft EIR, the number of daily delivery and haul trucks would be between eight to fifteen round-trips during the utilities phase, approximately twenty round-trips during the concrete and paving phase, and twenty round-trips during the building phase. VTTM site clearing, and subsequent Project grading activities would be balanced on-site; thus, no daily delivery or haul trucks are expected to be present during these phases.

Comment 2-14:

If you have any questions, please feel free to contact Mr. Alan Lin, the project coordinator, at (213) 269-1124 and refer to GTS # LA-2019-03764AL-Draft EIR.

Response 2-14:

The County appreciates the participation of Caltrans in the environmental review of this Project and will contact the designated Project coordinator with any questions. This comment does not address the information, analysis or conclusions in the Draft EIR and, for this reason, no further response is necessary.

From: Paul Novak <pnovak@lalafco.org>
Sent: Tuesday, November 23, 2021 8:45 AM
To: Jodie Sackett <jsackett@planning.lacounty.gov>
Cc: Carole Suzuki <Csuzuki@counsel.lacounty.gov>; Tiffani Shin <TShin@counsel.lacounty.gov>; Adriana Romo <aromo@lalafco.org>
Subject: Project No. 03-250-(5) (Sterling Ranch Estates)

Mr. Sackett:

This is Paul Novak, Executive Officer of the Local Agency Formation Commission for the County of Los Angeles (LAFCO).

I briefly reviewed the DEIR for Project No. 03-250-(5) (Sterling Ranch Estates). I am concerned that the section about "additional agency actions) on Page Page 1.0-6. Specifically, I am emailing to request that the FEIR address any potential annexations which may require LAFCO approval. Specifically, this may include:

- Annexation to Waterworks District No. 36, Val Verde;
- Santa Clarita Valley Water Agency;
- Greater Los Angeles County Vector Control District;
- Santa Clarita Valley Sanitation District of Los Angeles County; and/or
- Newhall Ranch Sanitation District of Los Angeles County.

3-1

While it is not clear to me that annexation is required, annexation may be required. In order to avoid any potential segmentation of CEQA, the FEIR should address/resole these matters. Further, to the extent that any such approval(s) is/are required, LAFCO should be identified as a responsible agency.

Thank you.

- Paul

COMMENT LETTER NO. 3:

Paul Novak
Executive Officer
Local Agency Formation Commission for the County of Los Angeles (LAFCO)

Comment 3-1:

I briefly reviewed the Draft EIR for Project No. 03-250-(5) (Sterling Ranch Estates). I am concerned that the section about "additional agency actions) on Page 1.0-6. Specifically, I am emailing to request that the FEIR address any potential annexations which may require LAFCO approval. Specifically, this may include:

- Annexation to Waterworks District No. 36, Val Verde;
- Santa Clarita Valley Water Agency;
- Greater Los Angeles County Vector Control District;
- Santa Clarita Valley Sanitation District of Los Angeles County; and/or
- Newhall Ranch Sanitation District of Los Angeles County.

While it is not clear to me that annexation is required, annexation may be required. In order to avoid any potential segmentation of CEQA, the FEIR should address/resole these matters. Further, to the extent that any such approval(s) is/are required, LAFCO should be identified as a responsible agency.

Thank you.

Response 3-1:

Annexation to the Santa Clarita Valley Sanitation District of Los Angeles County and Los Angeles County Lighting Maintenance District 1687 (CLMD 1687) are included as part of the Project. Section 3.0-6: Project Description, Intended Uses of the EIR, has been revised to include these annexations as discretionary approval actions required for the Project. Section 5.17.2: Utilities and Services Systems: Wastewater, in the Draft EIR also has been revised to identify annexation to the Santa Clarita Valley Sanitation District of Los Angeles County is required for the Project. These revisions are contained in **Section 2.0: Corrections, Clarifications, and Additions to the Draft EIR** of this Final EIR.

LOS ANGELES COUNTY SANITATION DISTRICTS
Converting Waste Into Resources

Robert C. Ferrante
Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

December 29, 2021

Ref. DOC 6374744

Mr. Jodie Sackett
County of Los Angeles
Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

Dear Mr. Sackett:

NOC Response to Sterling Ranch Estates

The Santa Clarita Valley Sanitation District (District) received a Notice of Completion (NOC) of a Draft Environmental Impact Report for the subject project on November 17, 2021. Previous comments submitted to your agency by the District in correspondence dated September 4, 2019, (copy enclosed) still apply to the subject project with the following updates: 4-1

1. **Section 4.0 Environmental Setting**, *page 4.0-19*, and **Section 5.17.2 Utilities and Service Systems: Wastewater**, *page 5.17.2-1*: the information stated that the Los Angeles County Sanitation Districts (Districts) consists of twenty-three districts, with a service area of 820 square miles. Please note that currently the Districts consists of 24 independent special districts, with service areas covering approximately 850 square miles. 4-2

2. **Section 4.0 Environmental Setting**, *page 4.0-19*, and **Section 5.17.2 Utilities and Service Systems: Wastewater**, *pages 5.17.2-2, -13, -15, and -16*: the information stated that there is planned expansion at the Valencia Water Reclamation Plant (WRP) to bring the District's total treatment capacity to 34.1 million gallons per day (mgd). However, the District currently has enough wastewater treatment capacity for the foreseeable future and has no plan to expand. 4-3

3. **Section 5.17.1 Utilities and Service Systems: Water Supply**, *page 5.17.1-3*, and **Section 5.17.2 Utilities and Service Systems: Wastewater**, *page 5.17.2-2*: the 2015 average effluent produced at Valencia and Saugus WRPs were provided. Please note that in 2020, the Valencia WRP and Saugus WRP produced an average of 13.6 mgd and 4.6 mgd of effluent, respectively. 4-4

4. **Section 5.17.2 Utilities and Service Systems: Wastewater**, *page 5.17.2-10*: the nearest District's liquid waste disposal station to the project site to dispose portable toilet waste is Saugus WRP. For additional information, please see https://www.lacsd.org/services/wastewater-programs-permits/liquid-waste-disposal. 4-5

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2743, or mandyhuffman@lacsd.org.

Very truly yours,

Mandy Huffman

Mandy Huffman
Environmental Planner
Facilities Planning Department

MNH:mnh

Enclosure

cc: D. Curry
A. Schmidt
A. Howard

DOC 6415927.SCVD99

SANITATION DISTRICTS OF LOS ANGELES COUNTY
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(562) 699-7411 • www.lacsd.org

September 4, 2019

Ref. DOC 5257886

Mr. Steven Jones
Los Angeles County
Department of Regional Planning
320 West Temple Street
Room 1362
Los Angeles, CA 90012

Dear Mr. Jones:

NOP Response for the Sterling Ranch Residential Project

The Santa Clarita Valley Sanitation District (District) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on August 8, 2019.We offer the following comments regarding sewerage service:

1. The majority of the project area is located outside the sphere of influence of the District, as adopted by the Local Agency Formation Commission (LAFCO). Therefore, until the current sphere of influence for the Santa Clarita Valley Sanitation District has been amended by LAFCO to include this area, the District will be unable to annex the area and provide sewerage service. 4-6

2. The entire project area is outside the jurisdictional boundaries of the District and will require annexation into the District before sewerage service can be provided to the proposed development. For a copy of the District's Annexation Information and Processing Fee sheets, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the appropriate link. For more specific information regarding the annexation procedure and fees, please contact Ms. Donna Curry at (562) 908-4288, extension 2708. 4-7

3. Because of the project's location, the flow originating from the proposed project would have to be transported to the District's trunk sewer by local sewer(s) that are not maintained by the District. If no local sewer lines currently exist, it is the responsibility of the developer to convey any wastewater generated by the project to the nearest local sewer and/or District's trunk sewer. The nearest District's trunk sewer is the Castaic Trunk Sewer, located in Hasley Canyon Road just west of The Old Road. The Districts' 15–inch diameter trunk sewer has a capacity of 3 million gallons per day (mgd) and conveyed a peak flow of 1.5 mgd when last measured in 2018. 4-8

4. The District operates two water reclamation plants (WRPs), the Saugus WRP and the Valencia WRP, which provide wastewater treatment in the Santa Clarita Valley. These facilities are interconnected to form a regional treatment system known as the Santa Clarita Valley Joint Sewerage System (SCVJSS). The SCVJSS has a capacity of 28.1 mgd and currently produces an average recycled water flow of 19.6 mgd. 4-9

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5. The expected average wastewater flow from the project, described in the notice as 222 single family homes and 21,000 square feet of commercial space, is 64,545 gallons per day. For a copy of the District's average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link. 4-10

6. The District is empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the District's Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer and General Manager will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Connection Fee Counter at (562) 908-4288, extension 2727. 4-11

7. In order for the District to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of District wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of District facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of District treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the District intends to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of District facilities. 4-12

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: D. Curry
A. Schmidt
A. Howard

DOC 5293562.SCVD99

COMMENT LETTER NO. 4:

Mandy Huffman
Environmental Planner
Adriana Raza
Customer Service Specialist

Facilities Planning Department
Los Angeles County Sanitation Districts
1955 Workman Mill Road
Whittier, California 90601

Comment 4-1:

The Santa Clarita Valley Sanitation District (District) received a Notice of Completion (NOC) of a Draft Environmental Impact Report for the subject project on November 17, 2021. Previous comments submitted to your agency by the District in correspondence dated September 4, 2019, (copy enclosed) still apply to the subject project with the following updates:

Response 4-1:

Please see the responses below to the individual comments in this letter.

Comment 4-2:

1. **Section 4.0 Environmental Setting**, *page 4.0-19*, and **Section 5.17.2 Utilities and Service Systems: Wastewater**, *page 5.17.2-1*: the information stated that the Los Angeles County Sanitation Districts (Districts) consists of twenty-three districts, with a service area of 820 square miles. Please note that currently the Districts consists of 24 independent special districts, with service areas covering approximately 850 square miles.

Response 4-2:

Section 4.0: Environmental Setting, page 4.0-19, and Section 5.17.2: Utilities and Service Systems: Wastewater, page 5.17.2-1 have been revised to state that the Los Angeles County Sanitation Districts (Districts) consists of 24 independent special districts, with service areas covering approximately 850 square miles.

These revisions are contained in **Section 2.0: Corrections, Clarifications, and Additions to the Draft EIR** of this Final EIR.

Comment 4-3:

2. **Section 4.0 Environmental Setting**, *page 4.0-19*, and **Section 5.17.2 Utilities and Service Systems: Wastewater**, *pages 5.17.2-2, -13, -15, and -16*: the information stated that there is planned expansion at the Valencia Water Reclamation Plant (WRP) to bring the District's total treatment capacity to 34.1

million gallons per day (mgd). However, the District currently has enough wastewater treatment capacity for the foreseeable future and has no plan to expand.

Response 4-3:

Section 4.0: Environmental Setting, page 4.0-19, and Section 5.17.2: Utilities and Service Systems: Wastewater, pages 5.17.2-2, -13, -15, and -16, have been revised to state that the Valencia WRP has enough wastewater treatment capacity for the foreseeable future and there are no current plans to expand.

These revisions are contained in **Section 2.0: Corrections, Clarifications, and Additions to the Draft EIR** of this Final EIR.

Comment 4-4:

3. **Section 5.17.1 Utilities and Service Systems: Water Supply**, *page 5.17.1-3*, and **Section 5.17.2 Utilities and Service Systems: Wastewater**, *page 5.17.2-2*: the 2015 average effluent produced at Valencia and Saugus WRPs were provided. Please note that in 2020, the Valencia WRP and Saugus WRP produced an average of 13.6 mgd and 4.6 mgd of effluent, respectively.

Response 4-4:

Section 5.17.1: Utilities and Service Systems: Water Supply, page 5.17.1-3, and Section 5.17.2: Utilities and Service Systems: Wastewater, page 5.17.2-2, have been revised to state that in 2020, the Valencia WRP and Saugus WRP produced an average of 13.6 million gallons per day (MGD) and 4.6 MGD of effluent, respectively.

These revisions are contained in **Section 2.0: Corrections, Clarifications, and Additions to the Draft EIR** of this Final EIR.

Comment 4-5:

4. **Section 5.17.2: Utilities and Service Systems: Wastewater**, *page 5.17.2-10*: the nearest District's liquid waste disposal station to the project site to dispose portable toilet waste is Saugus WRP. For additional information, please see https://www.lacsd.org/services/wastewater-programs-permits/liquid-waste-disposal.

Response 4-5:

The discussion in Section 5.17.2: Utilities and Service Systems: Wastewater on page 5.17.2-10, of the Draft EIR, of temporary wastewater impacts during construction has been revised to state that portable toilet waste generated during construction will be disposed of at the District's nearest liquid waste disposal station at the Saugus WRP.

This revision is contained in **Section 2.0: Corrections, Clarifications, and Additions to the Draft EIR** of this Final EIR.

Comment 4-6:

5. The majority of the project area is located outside the sphere of influence of the District, as adopted by the Local Agency Formation Commission (LAFCO). Therefore, until the current sphere of influence for the Santa Clarita Valley Sanitation District has been amended by LAFCO to include this area, the District will be unable to annex the area and provide sewerage service.

Response 4-6:

Section 3.0-6: Project Description, Intended Uses of the EIR, has been revised to include this annexation as a discretionary approval action required by the Project. Section 5.17.2: Utilities and Service Systems: Wastewater, in the EIR also has been revised to identify that annexation to the Santa Clarita Valley Sanitation District of Los Angeles County is required by the Project.

These revisions are contained in **Section 2.0: Corrections, Clarifications, and Additions to the Draft EIR** of this Final EIR.

Comment 4-7:

6. The entire project area is outside the jurisdictional boundaries of the District and will require annexation into the District before sewerage service can be provided to the proposed development. For a copy of the District's Annexation Information and Processing Fee sheets, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the appropriate link. For more specific information regarding the annexation procedure and fees, please contact Ms. Donna Curry at (562) 908-4288, extension 2708.

Response 4-7:

Section 3.0.6: Project Description, Intended Uses of the EIR, has been revised to include this annexation as a discretionary approval action required by the Project. Section 5.17.2: Utilities and Service Systems: Wastewater, in the EIR also has been revised to identify that annexation to the Santa Clarita Valley Sanitation District of Los Angeles County is required by the Project.

These revisions are contained in **Section 2.0: Corrections, Clarifications, and Additions to the Draft EIR** of this Final EIR.

Comment 4-8:

7. Because of the project's location, the flow originating from the proposed project would have to be transported to the District's trunk sewer by local sewer(s) that are not maintained by the District. If no local sewer lines currently exist, it is the responsibility of the developer to convey any wastewater generated by the project to the nearest local sewer and/or District's trunk sewer. The nearest District's

trunk sewer is the Castaic Trunk Sewer, located in Hasley Canyon Road just west of The Old Road. The Districts' IS-inch diameter trunk sewer has a capacity of 3 million gallons per day (mgd) and conveyed a peak flow of 1.5 mgd when last measured in 2018.

Response 4-8:

As discussed in Section 5.17.2: Utilities and Service Systems: Wastewater, of the Draft EIR, the Project includes construction of sewer facilities between the Project site and the District's trunk sewer. These facilities would be maintained by the Los Angeles County Consolidated Sewer Maintenance District. The improvements would include a proposed 4-inch ductile iron pipe sewer force main that would be constructed from the easterly VTTM site boundary within Del Valle Road approximately 3,425 feet to the point of connection with the existing 15-inch sewer line in Hasley Canyon Road to the north. Approximately 0.8 acres of existing roadway right-of-way would be disturbed within Del Valle Road during construction of the sewer mainline. Construction of these facilities would occur in conjunction with the construction of the Project and in accordance with LACDPW guidelines. The wastewater flows from the Project, when combined with other anticipated downstream sewer flows, would be 85.4 percent of designed pipeline capacity for sewer mainlines greater than 15-inches. Based on the analysis presented in the Sewer Study included as part of the Draft EIR, no improvements to any downstream sewers would be required to accommodate the wastewater flows generated by the Project. A Sewer Area Study was approved by the Los Angeles County Department of Public Works, Land Development Division on April 2, 2020, and is included as Appendix O.2 of the Draft EIR.

Comment 4-9:

8. The District operates two water reclamation plants (WRPs), the Saugus WRP and the Valencia WRP, which provide wastewater treatment in the Santa Clarita Valley. These facilities are interconnected to form a regional treatment system known as the Santa Clarita Valley Joint Sewerage System (SCVJSS). The SCV JSS has a capacity of 28.1 mgd and currently produces an average recycled water flow of 19.6 mgd.

Response 4-9:

The information in this comment is included in Section 5.17.2: Utilities and Service Systems: Wastewater on page 5.17.2-1 of the Draft EIR.

Comment 4-10:

9. The expected average wastewater flow from the project, described in the notice as 222 single family homes and 21,000 square feet of commercial space, is 64,545 gallons per day. For a copy of the District's average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table I, Loadings for Each Class of Land Use link.

Response 4-10:

The information in this comment is included in Section 5.17.2: Utilities and Service Systems: Wastewater on page 5.17.1-12 of the Draft EIR.

Comment 4-11:

10. The District is empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the District's Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer and General Manager will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, the developer should contact the Connection Fee Counter at (562) 908-4288, extension 2727.

Response 4-11:

Information pertaining to these fees discussed in this comment is included in Section 5.17.2: Utilities and Service Systems: Wastewater on page 5.17.2-8 of the Draft EIR. As stated in the Draft EIR, any person desiring to connect any lot to a public service line shall pay all fees or charges which may be required per applicable sections in compliance with Chapter 20.32, Sanitary Sewers, of the Los Angeles County Code. The Draft EIR additionally states that the payment of fees is a prerequisite to obtaining the permits required by the plumbing code set out in Los Angeles County Code, Title 25.

Comment 4-12:

11. In order for the District to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of District wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of District facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of District treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise the developer that the District

intends to provide this service up to the levels that are legally permitted and to inform the developer of the currently existing capacity and any proposed expansion of District facilities.

Response 4-12:

As discussed in Section 5.12: Population and Housing of the Draft EIR, the Project would include the development of 222 single-family homes consistent with existing land use and zoning designations and result in an increase of 686 persons and employment opportunities to the greater Santa Clarita Valley area. This growth would represent approximately 1.6, 5.5, and 0.08 percent of SCAG 2040 projections for population, housing, and employment, respectively. Such levels of growth are consistent with the population forecasts for the subregion as adopted by SCAG. As such, the Project has been included in the SCAG regional growth forecast for the County of Los Angeles.

OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF

February 16, 2022

Jodie Sackett, Senior Planner
County of Los Angeles
Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, California 90012

Dear Mr. Sackett:

NOTICE OF COMPLETION AND AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT STERLING RANCH ESTATES

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the November 2021 Notice of Completion and Availability of Draft Environmental Impact Report (Draft EIR), for the Sterling Ranch Estates Project (Project). The proposed Project, located at 29053 Coolidge Avenue, Val Verde, CA 91384, involves the development of 222 detached single-family residential units, 21,000 square feet of commercial uses on 2.5-acre lot, approximately thirty four acres of amenities including a private recreation pocket park, a private recreation lot, landscaped/open space HOA lots, strip lots, access road lots, infiltration and debris basins, and a pump station; and 19.6 acres for public and private streets for the community. The proposed Project would also provide a 10-foot wide private trail along the southern portion of the Project site as well as the dedication of a twenty-foot wide multiuse to Los Angeles County for the Del Valle Trail, located offsite, on a third party's property.

5-1

The proposed Project is located within the service area of the Department's Santa Clarita Valley Station (Station). Per 5.13.2 Sheriff Protection section on pages 5.13.2-1-5.13.2-2 of the Draft EIR regarding the Station's location shall be updated. The new Station, located at 26201 Golden Valley Road in Santa Clarita, is now fully operational since November 2021. The proposed Project is now approximately 14.6 miles from the Station. It may impact the current level of service provided by the Station due to the potential increase in resident population and developed land proposed by the Project. The commercial uses

5-2

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

A Tradition of Service
Since 1850

and trails components of the Project would also potentially increase the number of visitors and daytime population. In addition to the Project Design Features and Mitigation Measures indicated on pages 1.0-54-1.0-56 of the Draft EIR, the Department also recommends that the principles Crime Prevention through Environmental Design (CPTED) are incorporated in the design plans. Also, the Project Applicant will be required to pay all required development fees associated with the Project, such as the law enforcement facilities mitigation fee.

5-2

The Department remains concerned that continued growth and intensification of land uses within the service area will ultimately contribute to significant cumulative impacts on the Department's resources and operations. Accordingly, the Station reviewed the Draft EIR and authored the attached review comments (see correspondence dated February 14, 2022, from Captain Justin R. Diez).

5-3

Also, for future reference, the Department provides the following updated address and contact information for all requests for review comments, law enforcement service information, California Environmental Quality Act documents, and other related correspondence:

Tracey Jue, Director
Facilities Planning Bureau
Los Angeles County Sheriff's Department
211 West Temple Street
Los Angeles, California 90012

Attention: Planning Section

5-4

Should you have any questions regarding this matter, please contact me, at (323) 526-5657, or your staff may contact Ms. Rochelle Campomanes, at (323) 526-5614.

Sincerely,

ALEX VILLANUEVA, SHERIFF

Tracey Jue, Director
Facilities Planning Bureau

SH-AD-32A (8/17)

COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT
"A Tradition of Service Since 1850"

DATE: February 14, 2022
FILE NO:

OFFICE CORRESPONDENCE

FROM: JUSTIN R. DIEZ, CAPTAIN
SANTA CLARITA VALLEY
STATION

TO: TRACY JUE, DIRECTOR
FACILITIES PLANNING
BUREAU

SUBJECT: REVIEW COMMENTS ON THE NOTICE OF AVAILABILITY AND NOTICE OF COMPLETION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE STERLING RANCH ESTATES PROJECT

As requested by Facilities Planning Bureau (FPB), the Santa Clarita Valley Station (Station) of the Los Angeles Sheriff's Department (Department) reviewed the Notice of Availability (NOA) of a Draft Environmental Impact Report (Draft EIR) for the Sterling Ranch Project (Project). The proposed Project, located at 29053 Coolidge Avenue, Val Verde, CA 91384, involves the development of 222 detached single-family residential units, 21,000 square feet of commercial uses on 2.5-acre lot, approximately thirty four acres of amenities including a private recreation pocket park, a private recreation lot, landscaped/open space HOA lots, strip lots, access road lots, infiltration and debris basins, and a pump station; and 19.6 acres for public and private streets for the community. The proposed Project would also provide a 10-foot wide private trail along the southern portion of the Project site as well as the dedication of a twenty-foot wide multiuse to Los Angeles County for the Del Valle Trail, located offsite, on a third party's property. 5-5

Upon review of the Draft EIR, the new Station location as indicated on Section 5.13.2 Sheriff Protection on pages 5.13.2-1-5.13.2-2 of the Draft EIR shall be updated. The new Station, located at 26201 Golden Valley Road in Santa Clarita, is now fully operational since November 2021. The proposed Project is now approximately 14.6 miles from the Station. The proposed Project's physical parameters, building programs including the commercial uses and trails components, and the anticipated growth in both resident, visitors, and daytime and evening population would have a significant impact to our law enforcement services. Providing a security personnel at the Project site and security cameras with associated lighting in addition to the Project's design elements for increased safety would potentially result into the less than significant impact on our law enforcement services. 5-6

Also, the Station coordinated with the City of Santa Clarita regarding its service area update recently. The Station's service area of 649 square miles under the Los Angeles County Sheriff's Department Service Facilities per Section 5.13.2 Sheriff Protection on page 5.13.2-1 of the Draft EIR shall be updated. The Station is serving the areas of City of Santa Clarita, Santa Clarita Valley communities, unincorporated communities of North Los Angeles County and the Angeles National Forest for a total of 656 square miles. Overall, the Draft EIR concluded that the impact of the proposed Project to the Station's resources and operations would be less than significant. 5-7

The Station remains concerned that continued growth and intensification of multi-use land uses within the service area will ultimately contribute to significant cumulative impacts on the Department's resources and operations. It is reasonable to expect that continued development will lead to a significant increase in the demand for law enforcement services. Meeting such demand will require additional resources, including patrol deputies, other sworn deputies, support personnel, and attendant assets, such as patrol vehicles, support vehicles, communications equipment, weaponry, office furnishings/equipment, etc.

Thank you for including the Station in the review process for the proposed Project. Should you have any questions regarding this matter, please contact Rochelle Campomanes, Departmental Facilities Planner I, at (323) 526-5614, of our Facilities Planning Bureau. 5-8

JRD:RDE:rde

COMMENT LETTER NO. 5:

Los Angeles County Sheriff's Department
Alex Villanueva, Sheriff
Tract Jue, Director – Facilities Planning Bureau
Justin R Diez, Captain – Santa Clarita Valley Station
211 West Temple Street
Los Angeles, California 90012

Comment 5-1:

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the November 2021 Notice of Completion and Availability of Draft Environmental Impact Report (Draft EIR), for the Sterling Ranch Estates Project (Project). The proposed Project, located at 29053 Coolidge Avenue, Val Verde, CA 91384, involves the development of 222 detached single-family residential units, 21,000 square feet of commercial uses on 2.5-acre lot, approximately thirty four acres of amenities including a private recreation pocket park, a private recreation lot, landscaped/open space HOA lots, strip lots, access road lots, infiltration and debris basins, and a pump station; and 19.6 acres for public and private streets for the community. The proposed Project would also provide a 10-foot wide private trail along the southern portion of the Project site as well as the dedication of a twenty-foot wide multiuse to Los Angeles County for the Del Valle Trail, located offsite, on a third party's property.

Response 5-1:

This comment provides a summary of the Project. This comment does not address the information, analysis or conclusions in the Draft EIR and, for this reason, no further response is necessary.

Comment 5-2:

The proposed Project is located within the service area of the Department's Santa Clarita Valley Station (Station). Per 5.13.2 Sheriff Protection section on pages 5.13.2-1-5.13.2-2 of the Draft EIR regarding the Station's location shall be updated. The new Station, located at 26201 Golden Valley Road in Santa Clarita, is now fully operational since November 2021. The proposed Project is now approximately 14.6 miles from the Station. It may impact the current level of service provided by the Station due to the potential increase in resident population and developed land proposed by the Project. The commercial uses and trails components of the Project would also potentially increase the number of visitors and daytime population. In addition to the Project Design Features and Mitigation Measures indicated on pages l.0-54-1.0-55 of the Draft EIR, the Department also recommends that the principles Crime Prevention through Environmental Design (CPTED) are incorporated in the design plans. Also, the Project Applicant will be required to pay all required development fees associated with the Project, such as the law enforcement facilities mitigation fee.

Response 5-2:

As discussed in Draft EIR Section 5.13.2: Sheriff Protection, the Department's Santa Clarita Valley Station is identified as responsible for providing general law enforcement in the Santa Clarita Valley, including to the Project site. The new Station at 26201 Golden Valley Road was under construction at the time the Draft EIR was released for public comment. The Golden Valley Road Station is located approximately 9 miles southeast of the Project site in a straight line, per the Draft EIR, page 5.13.2-1. The Project is approximately 14 miles from the Golden Valley Road Station via roadways. Crime Prevention through Environmental Design (CPTED) principles have been included in mitigation measure MM 5.13.2-1. The measure includes "defensible space" incorporated into the design of a Project which would help reduce the number of calls and need for service on the Project site. These measures include changes to lighting, landscape materials and building orientation, which could limit visibility or offer concealment to intruders. Additionally, development fees associated with the Project, including the law enforcement facilities fee for Sheriff facilities would be paid prior to the issuance of building permits, as required by Los Angeles County Code Section 22.246.070.

Comment 5-3:

The Department remains concerned that continued growth and intensification of land uses within the service area will ultimately contribute to significant cumulative impacts on the Department's resources and operations. Accordingly, the Station reviewed the Draft EIR and authored the attached review comments (see correspondence dated February 1, 2022, from Captain Justin R. Diez).

Response 5-3:

As discussed by the Draft EIR Section 5.13.2: Sheriff Protection, and in *Response No. 5-2*, the law enforcement facilities fee would be paid prior to the issuance of building permits as required Los Angeles County Code Section 22.246.070. This fee would serve to help pay for land acquisition, engineering, construction, installation, purchasing, and other costs for the provision of capital law enforcement facilities and equipment needed to serve new development in the unincorporated Santa Clarita Valley. Additional operational funding for the Sheriff's Department in the Santa Clarita Valley area and the rest of Los Angeles County would be derived from various types of tax revenues (e.g., property taxes, sales taxes, user taxes, vehicle license fees, and deed transfer fees), which are deposited in the County's General Fund. The County Board of Supervisors then allocates the revenue for various public services provided by the County, including law enforcement services. A portion of these revenues would be allocated to the Sheriff's Department during the County's annual budget process to maintain staffing and equipment levels at the Santa Clarita Valley Sheriff's Station in numbers adequate to serve Project-related increases in service demands. Further, implementation of mitigation measure MM 5.13.2-1 would help reduce the number of calls and need for service on the Project site as stated in *Response No. 5-2*. The payment of the law

enforcement facilities fee and the implementation of mitigation measure MM 5.13.2-1 would thereby reduce impacts to a less than significant as defined by CEQA.

Comment 5-4:

Also, for future reference, the Department provides the following updated address and contact information for all requests for review comments, law enforcement service information, California Environmental Quality Act documents, and other related correspondence:

Tracey Jue, Director
Facilities Planning Bureau
Los Angeles County Sheriff's Department
211 West Temple Street
Los Angeles, California 90012
Attention: Planning Section

Should you have any questions regarding this matter, please contact me, at (323) 526-5657, or your staff may contact Ms. Rochelle Campomanes, at (323) 526-5614

Response 5-4:

This comment indicates the updated address and contact information of the Sheriff's Department for all requests related to CEQA. This comment does not address the information, analysis or conclusions in the Draft EIR and, for this reason, no further response is necessary.

Comment 5-5:

As requested by Facilities Planning Bureau (FPB), the Santa Clarita Valley Station (Station) of the Los Angeles Sheriff's Department (Department) reviewed the Notice of Availability (NOA) of a Draft Environmental Impact Report (Draft EIR) for the Sterling Ranch Project (Project). The proposed Project, located at 29053 Coolidge Avenue, Val Verde, CA 91384, involves the development of 222 detached single-family residential units, 21,000 square feet of commercial uses on 2.5-acre lot, approximately thirty four acres of amenities including a private recreation pocket park, a private recreation lot, landscaped/open space HOA lots, strip lots, access road lots, infiltration and debris basins, and a pump station; and 19.6 acres for public and private streets for the community. The proposed Project would also provide a 10-foot-wide private trail along the southern portion of the Project site as well as the dedication of a twenty-foot wide multiuse to Los Angeles County for the Del Valle Trail, located offsite, on a third party's property.

Response 5-5:

Please refer to *Response 5-1*.

Comment 5-6:

Upon review of the Draft EIR, the new Station location as indicated on Section 5.13.2: Sheriff Protection on pages 5.13.2-1-5.13.2-2 of the Draft EIR shall be updated. The new Station, located at 26201 Golden Valley Road in Santa Clarita, has been open since November 2021. The proposed Project is now

approximately 14.6 miles from the Station. The proposed Project's physical parameters, building programs including the commercial uses and trails components, and the anticipated growth in both resident, visitors, and daytime and evening population would have a significant impact to our law enforcement services. Providing a security personnel at the Project site and security cameras with associated lighting in addition to the Project's design elements for increased safety would potentially result into the less than significant impact on our law enforcement services.

Response 5-6:

Please refer to *Response 5-2* regarding the new Station located at 26201 Golden Valley Road. As discussed in Draft EIR Section 5.13.2: Sheriff Protection, the payment of the law enforcement facilities fee prior to the issuance of building permits as required Los Angeles County Code Section 22.246.070 would reduce direct impacts to law enforcement associated with the Project. As indicated in Response 5-3, the fee would serve to help pay for land acquisition, engineering, construction, installation, purchasing, and other costs for the provision of capital law enforcement facilities and equipment needed to serve new development in the unincorporated Santa Clarita Valley. Additionally, as discussed in Draft EIR Section 5.13.2: Sheriff Protection, the implementation of mitigation measure MM 5.13.2-1 would reduce the reduce the number of calls and need for service to the Project site. As indicated in *Response 5-2*, Crime Prevention through Environmental Design (CPTED) principles have been included in mitigation measure MM 5.13.2-1. The measure includes “defensible space” incorporated into the design of the Project which would help reduce the number of calls and the need for service on the Project site. These measures include changes to lighting, landscape materials and building orientation, which could limit visibility or offer concealment to intruders. The payment of the law enforcement facilities fee and the implementation of mitigation measure MM 5.13.2-1 would thereby reduce law enforcement impacts to a less than significant as defined by CEQA.

Comment 5-7:

Also, the Station coordinated with the City of Santa Clarita regarding its service area update recently. The Station's service area of 649 square miles under the Los Angeles County Sheriffs Department Service Facilities per Section 5.13.2 Sheriff Protection on page 5.13.2-1 of the Draft EIR shall be updated. The Station is serving the areas of City of Santa Clarita, Santa Clarita Valley communities, unincorporated communities of North Los Angeles County and the Angeles National Forest for a total of 656 square miles. Overall, the Draft EIR concluded that the impact of the proposed Project to the Station's resources and operations would be less than significant.

The Station remains concerned that continued growth and intensification of multi-use land uses within the service area will ultimately contribute to significant cumulative impacts on the Department's resources and operations. It is reasonable to expect that continued development will lead to a significant increase in the demand for law enforcement services. Meeting such demand will require additional resources,

including patrol deputies, other sworn deputies, support personnel, and attendant assets, such as patrol vehicles, support vehicles, communications equipment, weaponry, office furnishings/equipment, etc.

Response 5-7:

This comment indicates that the service area for the Sheriff's Department was recently updated and has expanded to a total of 656 square miles. This change has been made in **Section 2.0: Corrections, Clarifications, Additions** of this Final EIR.

As discussed in Draft EIR Section 5.13.2: Sheriff Protection, the payment of the law enforcement facilities fee prior to the issuance of building permits as required Los Angeles County Code Section 22.246.070 would reduce direct impacts to law enforcement associated with the Project. As indicated in *Response 5-3*, the fee would serve to help pay for land acquisition, engineering, construction, installation, purchasing, and other costs for the provision of capital law enforcement facilities and equipment needed to serve new development in the unincorporated Santa Clarita Valley. Additional operational funding for the Sheriff's Department in the Santa Clarita Valley area and the rest of Los Angeles County would be derived from various types of tax revenues (e.g., property taxes, sales taxes, user taxes, vehicle license fees, and deed transfer fees), which are deposited in the County's General Fund. The County Board of Supervisors then allocates the revenue for various public services provided by the County, including law enforcement services. A portion of these revenues would be allocated to the Sheriff's Department during the County's annual budget process to maintain staffing and equipment levels at the Santa Clarita Valley Sheriff's Station in numbers adequate to serve Project-related increases in service demands.

Additionally, as discussed in Draft EIR Section 5.13.2: Sheriff Protection, the implementation of mitigation measure MM 5.13.2-1 would reduce the reduce the number of calls and need for service to the Project site. As indicated in *Response 5-2*, Crime Prevention through Environmental Design (CPTED) principles have been included in mitigation measure MM 5.13.2-1. The measure includes "defensible space" incorporated into the design of the Project which would help reduce the number of calls and the need for service on the Project site. These measures include changes to lighting, landscape materials and building orientation, which could limit visibility or offer concealment to intruders.

The payment of the law enforcement facilities fee and the implementation of mitigation measure MM 5.13.2-1 would thereby reduce law enforcement impacts to a less-than-significant level as defined by CEQA.

Comment 5-8:

Thank you for including the Station in the review process for the proposed Project. Should you have any questions regarding this matter, please contact Rochelle Campomanes, Departmental Facilities Planner I, at (323) 526-5614, of our Facilities Planning Bureau.

Response 5-8:

This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no response is necessary.

STATE OF CALIFORNIA–THE NATURAL RESOURCES AGENCY GAVIN NEWSOM, *Governor*

SANTA MONICA MOUNTAINS CONSERVANCY
KING GILLETTE RANCH
26800 MULHOLLAND HIGHWAY
CALABASAS, CALIFORNIA 91302
PHONE (310) 589-3200
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January 24, 2022

Jodie Sackett
County of Los Angeles
Department of Regional Planning
Land Division Section
320 West Temple Street, Room 1362
Los Angeles, California 90012

Draft Environmental Impact Report Comments
Sterling Ranch Estates Residential Project

Dear Ms. Sackett:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments to substantiate our opposition to the Sterling Ranch Estates Residential Project (Project), as proposed in the Draft Environmental Impact Report (DEIR) for Project No. 03-250-(5) and Vesting Tentative Tract Map No. 060257 (VTTM), to construct 222 dwelling units on approximately 114 acres near the most easterly extent of the Sierra Madre Mountains north of Highway 126 and east of Interstate 5 in the vicinity of Val Verde, unincorporated Los Angeles County. The Conservancy incorporates all comments presented in our August 26, 2019, letter and offers additional comments as described below. 6-1

This Project must, among other recommendations, incorporate "net zero" greenhouse gas designs including no methane gas hookups, incorporate structure hardening measures appropriate for Very High Fire Hazard Severity Zone (VHFHSZ) development, conduct focused biological surveys following seasonal rainfall, dedicate the entire 94.97 acres of Assessor Parcel Number (APN) 3271-005-032 as open space with adequate long-term management funding, incorporate a wildlife corridor and crossing structure at Del Valle Road, and ensure that all parks and trails are open to the general public.

"Net Zero" Greenhouse Gas Design

In order to overcome persistent issues with increasing greenhouse gas emissions from suburban and rural residential developments, the developers of Tejon Ranch agreed to modify the development to include solar panels on rooftops, electric vehicle charging stations, and no methane gas hookups. The Tejon Ranch settlement also incorporated a Climate Hazard Abatement District to fund ongoing fire protection and prevention 6-2

measures in a VHFHSZ. The proponents of this Project would be wise to include these measures in their development plans. The Conservancy supports this compromise approach to minimize greenhouse gas emissions and increase community resiliency.

In 2021, the Climate Insurance Working Group, convened by Insurance Commissioner Ricardo Lara, published their consensus Draft Climate Insurance Recommendations that emphasize "The best long-term resilience strategy [to reduce risk and increase recovery capacity] is a dramatic reduction in the emissions that cause climate change." Thus, the County must begin the hard work of adding Conditions of Approval that result in drastically lowering the emissions profile of future developments in order for the state to reach 40-percent reduction of 1990 level emissions by 2030. The pace of reduction must accelerate to meet this goal, and the most populous county of California has a responsibility to act.

6-2

Building New Homes in Hazardous Areas

Since our region's most destructive wildfires have been wind-driven wildfires with ember-casts in excess of one mile, significant measures should be implemented to harden structures proposed for development in a designated VHFHSZ: clustered development, underground placement of all electrical lines, roll-down window shutters, closed eaves, ember-resistant roof vents, and exterior sprinklers drawing water from an emergency reserve water supply tank connected to a reserve power source. A Community Wildfire Protection Plan designed to address wildfire risks from the structure outward (rather than from the wildland inward) should be required, and a Climate Hazard Abatement District should be developed to fund future costs associated with disaster avoidance and recovery.

6-3

The DEIR also discloses the Project site includes 13 mapped landslides with the Holser fault and Oak Canyon fault traversing the southern and northern (respective) areas of the Project site and the Santa Susana fault 6.1 miles away. In May 2015, during construction of the nearby Sterling Gateway Industrial Park, grading activities triggered a landslide involving one of the manufactured slopes. The Project proposes 1.5 million cubic yards of cut and 1.5 million cubic yards of fill with approximately 25-percent of the development sited on slopes greater than 50-percent. The VTTM shows many of the proposed home sites above and below manufactured slopes and a manufactured slope above existing, off-site homes on Silver Street. Given the steep and demonstrated unstable terrain, the DEIR did not sufficiently propose alternatives that reduced the risk of landslide(s), did not propose alternative lot configurations to minimize home sites near manufactured slopes, and did not

6-4

analyze impacts to off-site properties that could be effected by landslides originating from the proposed Project site. 6-4

Further, the Project site's geologic setting is responsible for the petroleum deposits that have sustained an onsite petroleum extraction industry to the current day. Per the DEIR, subsurface exploration for groundwater determine its contact depth ranging from 20 feet to 45 feet and areas where groundwater is as shallow as 10 feet. However, the DEIR fails to analyze whether construction-related dewatering and/or operation-related surface flow following high rainfall events on the 3 million cubic yards of grading would mobilize petro-chemicals in contaminated soils or groundwater or have the potential to contaminate water quality of the Santa Clara River. 6-5

Biological Resources

As presented in the DEIR, "seasonally timed focused [biological] surveys of the VTTM site, Off-Site Roadway Improvement Area, and Off-Site Open Space Dedication Area were conducted in May and July 2017. Additionally, seasonally timed focused [biological] surveys of the [Project Area] were conducted in May 2020, June 2020, July 2020, and August 2020." Thus, the entirety of focused biological studies for this Project were conducted during extreme drought years. Because of the rainfall that has fallen in December 2021, additional spring and summer biological surveys are required to ensure a fuller accounting of habitat and wildlife that would be impacted by the Project. 6-6

Focused surveys for amphibians, such as the western spadefoot toad (*Spea hammondii*) that is known to exist within a half-mile to the east of the Project site, are especially critical following seasonal rain events. A development condition for the nearby Sterling Gateway Industrial Park was to construct and maintain an ephemeral pond and buffer zone for western spadefoot. Due to the proximity and similar habitat types, western spadefoot are likely to occur within the Project Area and similar mitigation should be required. 6-7

Areas south of Del Valle Road are known to contain a low shrub and grassland habitat termed "Palmer's goldenbush (*Ericameria palmeri*) scrub alliance" that typically blooms in late August through September and performs an essential habitat function as a late-season wildflower important to native pollinators. Supplemental biological surveys following a year of more seasonal rains should be required to ensure this unique and rare habitat is fully accounted for. 6-8

Proper mitigation measures to avoid coastal sage scrub and chaparral (CSS/C) and compensate for loss of CSS/C and grassland habitat must be included in the Project. The Conservancy recommends a minimum mitigation ratio of 2:1 for temporary and permanent impacts to CSS/C, a minimum mitigation ratio of 2:1 for temporary and permanent impacts to native or non-native grasslands, and a minimum 3:1 mitigation ratio for temporary and permanent impacts to Palmer's goldenbush scrub habitat should supplemental surveys document additional occurrences within the Project site. 6-9

If replacement acreage for impacted habitat cannot be accomplished through onsite restoration, the Conservancy recommends the Project Applicant enter into an agreement with a conservation or parks agency–such as the Mountains Recreation and Conservation Authority–to acquire, preserve and/or restore appropriate habitat types of sufficient acreage. 6-10

Open Space Parcel Dedication

The Project developer is proposing to dedicate approximately 37.9 acres of APN 3271-005-032 as compensatory open space in addition to the 41.3 acres of existing conservation easement over this same APN related to the development of nearby Sterling Gateway Industrial Park. This would leave a remainder of approximately 15.77 acres of APN 3271-005-032 for future development of an exclusive "ranch home" development project. This scenario represents a textbook example of piecemeal development that will destroy the last remaining north/south habitat connection from areas north of the Project site southward to the Santa Clara River.

The County has designated the Santa Clara River as a Significant Ecological Area (SEA No. 20) that allows wildlife to migrate from the Pacific Ocean to the San Gabriel Mountains. However, if north/south connections to the Santa Clara River are blocked, then this SEA fails to perform its vital functions. The Santa Felicia SEA (SEA No. 21) is located northeast of the proposed Project and connects to the Angeles National Forest. Because significant impacts to the north/south connectivity to the Santa Clara River are already approved with the Newhall Ranch development project and expansion of the Chiquita Canyon Landfill, remaining habitat connections to the Santa Clara River are of paramount importance to protect and preserve. 6-11

Jodie Sackett
County of Los Angeles
Draft Environmental Impact Report Sterling Ranch Estates Residential Project
January 24, 2022
Page 5

In addition to preserving the entirety of APN 3271-005-032, the Project must also include a permanent, long-term maintenance fund to support the persistence of this open space dedication as suitable habitat for mountain lion, mule deer, western spadefoot, gnatcatcher, and various other wildlife known to exist in the vicinity. Habitat connections to these seemingly remote locations are required to maintain the genetic diversity of various species as climate change and development continue to adversely affect listed, and candidate for listing, species protected by the California Endangered Species Act. Any open space dedication without a permanent maintenance fund obligation is incomplete and inadequate. 6-12

There are several options to ensure a permanent funding source to monitor and protect fee simple open spaces including a developer-funded long-term maintenance account, a landscape maintenance district, or a community facilities district. A guaranteed annual minimum $5,000 payment–indexed to a CPI (or similar) inflation adjustor–must be included in a Home Owners' Association CC&R for non-tract-contiguous open space maintenance to cover decades of increasing pressures from humans and domestic pets.

Wildlife Movement

Currently, the only wildlife route through the Project would require a circuitous path using steep manufactured slopes and crossing the Project-expanded Del Valle Road. Years of genetic and tracking data indicate roads pose the most significant barriers to wildlife movement.

The range of alternatives evaluated by the DEIR did not include an adequate reduced environmental impact option and failed to analyze alternatives that include: (1) a dedicated north/south wildlife corridor connecting the northern, undeveloped off-site area to the southerly proposed open space and conservation easement areas, (2) a wildlife crossing structure of sufficient size to accommodate large mammals crossing Del Valle Road, and (3) retaining existing oak trees and increasing opportunities for native vegetation to grow in more and/or larger debris or infiltration basins in order to provide cover habitat for species to "leap frog" through the proposed Project site. Considering the total volume of grading required to build the Project as proposed, additional detention basins and a wildlife crossing structure would result in an insignificant deviation from the proposed Project. 6-13

A dedicated wildlife corridor would also provide opportunities to incorporate additional open space to help mitigate for urbanized heat island effects as climate change continues

to raise temperatures in Southern California. 6-13

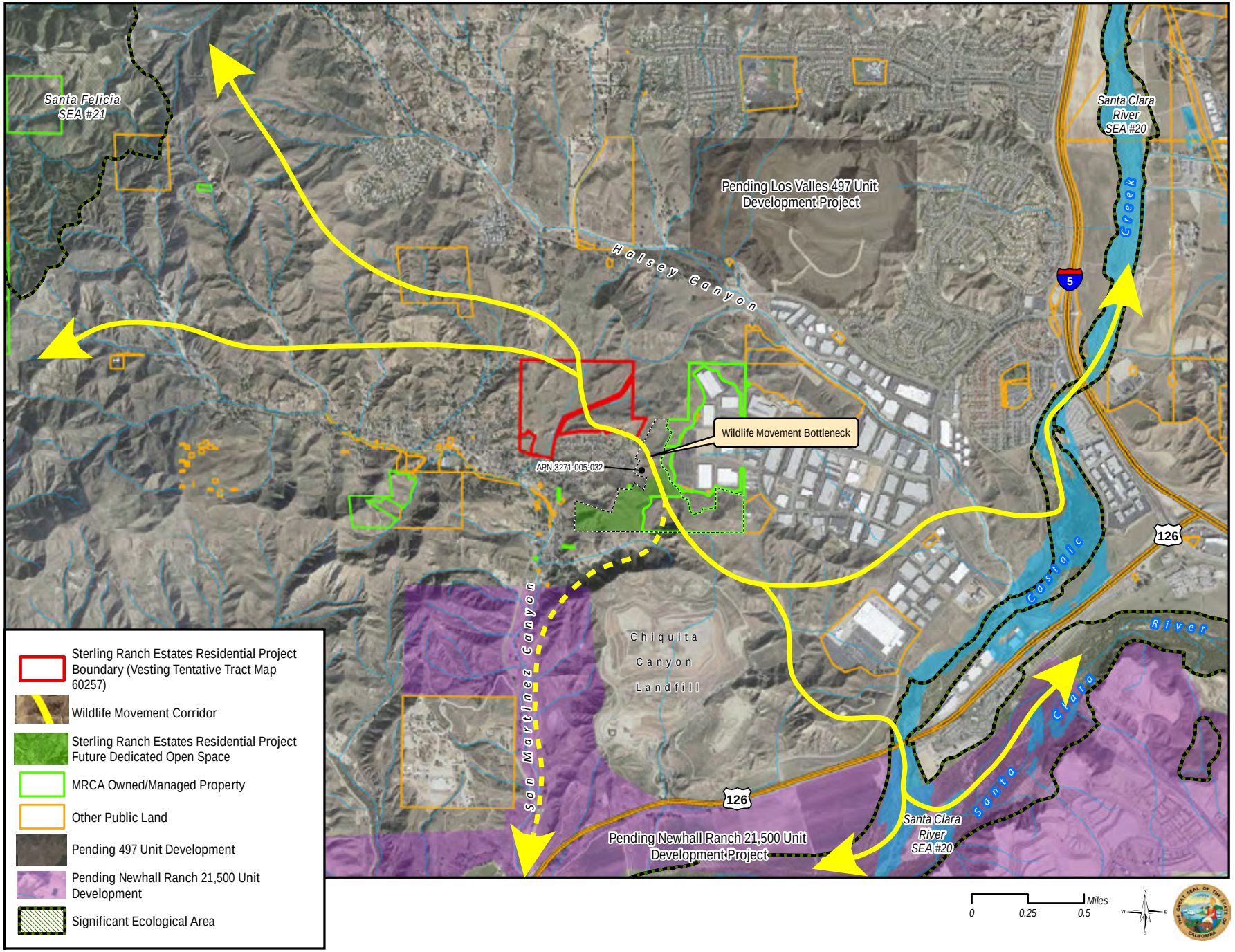
Public Parks and Trails

The Conservancy is dismayed that the Project proposes private parks and trails that would exclude existing area residents. All parks and trails must be open to the public with bilingual (English and Spanish) signage indicating the public's right to use said parks and trails with appropriate rules of use. 6-14

Please address any future correspondence to Paul Edelman, Deputy Director Natural Resources and Planning, at the above letterhead address, by email at edelman@smmc.ca.gov, or by phone at (310) 589-3200 ext. 128.

Sincerely,

LINDA PARKS
Chairperson


Santa Felicia
SEA #21
Pending Los Valles 497 Unit
Development Project
Halsey Canyon
Santa Clara
River
SEA #20
Creek
5
Wildlife Movement Bottleneck
APN 3271-005-032
126
Castaic
River
Chiquita
Canyon
Landfill
San Martinez Canyon
Santa Clara River
Pending Newhall Ranch 21,500 Unit
Development Project
Sterling Ranch Estates Residential Project Boundary (Vesting Tentative Tract Map 60257)
Wildlife Movement Corridor
Sterling Ranch Estates Residential Project Future Dedicated Open Space
MRCA Owned/Managed Property
Other Public Land
Pending 497 Unit Development
Pending Newhall Ranch 21,500 Unit Development
Significant Ecological Area
0
0.25
0.5
Miles

COMMENT LETTER NO. 6:

Linda Parks
Chairperson
Santa Monica Mountains Conservancy
King Gillette Ranch
26800 Mulholland Highway
Calabasas, California 91302

Comment 6-1:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments to substantiate our opposition to the Sterling Ranch Estates Residential Project (Project), as proposed in the Draft Environmental Impact Report (Draft EIR) for Project No. 03-250-(5) and Vesting Tentative Tract Map No. 060257 (VTTM), to construct 222 dwelling units on approximately 114 acres near the most easterly extent of the Sierra Madre Mountains north of Highway 126 and east of Interstate 5 in the vicinity of Val Verde, unincorporated Los Angeles County. The Conservancy incorporates all comments presented in our August 26, 2019, letter and offers additional comments as described below.

This Project must, among other recommendations, incorporate "net zero" greenhouse gas designs including no methane gas hookups, incorporate structure hardening measures appropriate for Very High Fire Hazard Severity Zone (VHFHSZ) development, conduct focused biological surveys following seasonal rainfall, dedicate the entire 94.97 acres of Assessor Parcel Number (APN) 3271-005-032 as open space with adequate long-term management funding, incorporate a wildlife corridor and crossing structure at Del Valle Road, and ensure that all parks and trails are open to the general public.

Response 6-1:

This introductory comment summarizes the characteristics of the Project and the comments that follow. Please see the responses below to the individual comments below.

Comment 6-2:

In order to overcome persistent issues with increasing greenhouse gas emissions from suburban and rural residential developments, the developers of Tejon Ranch agreed to modify the development to include solar panels on rooftops, electric vehicle charging stations, and no methane gas hookups. The Tejon Ranch settlement also incorporated a Climate Hazard Abatement District to fund ongoing fire protection and prevention measures in a VHFHSZ. The proponents of this Project would be wise to include these measures in their development plans. The Conservancy supports this compromise approach to minimize greenhouse gas emissions and increase community resiliency.

In 2021, the Climate Insurance Working Group, convened by Insurance Commissioner Ricardo Lara, published their consensus Draft Climate Insurance Recommendations that emphasize "The best long-term resilience strategy [to reduce risk and increase recovery capacity] is a dramatic reduction in the emissions that cause climate change." Thus, the County must begin the hard work of adding Conditions of Approval

that result in drastically lowering the emissions profile of future developments in order for the state to reach 40- percent reduction of 1990 level emissions by 2030. The pace of reduction must accelerate to meet this goal, and the most populous county of California has a responsibility to act.

Response 6-2:

The Draft EIR analyzed greenhouse gas emissions in Section 5.7: Greenhouse Gas Emissions and determined the Project's impacts to be less than significant. The Project would adhere to zoning requirements regarding installation of electric vehicle (EV) charging stations. The proposed commercial uses would be required to provide EV charging facilities per CALGreen requirements, and all residential units would have solar and the capability for EV charging. The Project would comply with Title 24 and the energy efficiency measures in the County's Green Building Ordinance, which require the Project's residential buildings to install solar photovoltaic (PV) systems, residential buildings to have the capability for EV charging, and the installation of EV charging stations for the commercial use. The Project would also include energy efficient appliances per the 2019 California Building Standards Code. The Project will meet all applicable requirements to reduce GHG emissions.

Wildfire impacts are evaluated in Section 5.8: Hazards and Hazardous Materials and in Section 5.18: Wildfire of the Draft EIR. Based on substantial evidence from the Fire Behavior Analysis and Report, included as Appendix P to the Draft EIR, the Project would comply with all proposed State and County requirements related to land management within a Very High Fire Hazard Severity Zone, including an approved Fuel Modification Plan. The Project would be constructed in compliance with applicable California Building Standards Code (CBSC) and California Fire Code (CFC) regulations that would ensure that appropriate measures, including fire prevention and fuel modification features, would be incorporated into the Project, so that urban development would not expose Project occupants to increased and uncontrolled wildfire hazards. The Project would meet fire hardening requirements for projects located in a Very High Fire Hazard Severity Zone, including Chapter 7A of the CBSC, Chapter 49 of the CFC, and Section R337 of the California Residential Code as adopted and amended by the County of Los Angeles. The Project would be designed and developed in accordance with the County Building Code requirements and has an approved fuel modification plan that meets the criteria for the development area. The Fire Behavior Analysis and Report indicates that only limited fire resources would be required to protect the Project site due to radiant heat mitigations, ember resistance and limited use of combustible materials on the exterior of the structures, wide streets, good water supply and defensible space around the structures. The location and size of the Project is not comparable to the Centennial Project in Tejon Ranch. Based on the location and characteristics of the Project, as discussed above, the formation of a Climate Hazard Abatement District to fund ongoing fire protection and prevention measures is not warranted for this Project.

Comment 6-3:

Since our region's most destructive wildfires have been wind-driven wildfires with embercasts in excess of one mile, significant measures should be implemented to harden structures proposed for development in a designated VHFHSZ: clustered development, underground placement of all electrical lines, roll-down window shutters, closed eaves, ember-resistant roof vents, and exterior sprinklers drawing water from an emergency reserve water supply tank connected to a reserve power source. A Community Wildfire Protection Plan designed to address wildfire risks from the structure outward (rather than from the wildland inward) should be required, and a Climate Hazard Abatement District should be developed to fund future costs associated with disaster avoidance and recovery.

Response 6-3:

Please see *Response 6-2* for discussion of the wildfire safety features that will be included in the Project as required by Chapter 7A/Section R337 of the County Building Code for development in a Very High Fire Hazard Severity Zone (VHFHSZ), including radiant heat mitigations, ember resistance and limited use of combustible materials on the exterior of the structures.

The Project would be constructed in compliance with applicable CBSC and CFC regulations that would ensure appropriate measures, including fire prevention and fuel modification features, would be implemented as part of the Project, so that urban development would not expose Project occupants to increased and uncontrolled wildfire hazards. The Project would be designed and developed in accordance with the County Building Code requirements and has an approved fuel modification plan that meets the criteria for the development area. Further, the Project would include the construction of a one-million-gallon water tank in the Off-Site Water Tank Area. The water tank would be sized to accommodate the Project and additional fire-fighting capacity in the surrounding Val Verde community, in accordance with Los Angeles County Waterworks District No. 36 requirements.

As discussed in the Draft EIR, the Project's development would not contribute to, or exacerbate, wildfire risks. Given the compliance of the Project with all proposed State and County requirements related to land management within a Very High Fire Hazard Severity Zone, including an approved Fuel Modification Plan, the Project would not result in significant wildfire-related impacts on the Project site. Furthermore, implementation of the Project, combined with other projects within the Val Verde/Castaic area, would not result in increased wildfire hazard risks. Therefore, the preparation of a Community Wildfire Protection Plan as suggested in this comment is not warranted.

Comment 6-4:

The Draft EIR also discloses the Project site includes 13 mapped landslides with the Holser fault and Oak Canyon fault traversing the southern and northern (respective) areas of the Project site and the Santa Susana fault 6.1 miles away. In May 2015, during construction of the nearby Sterling Gateway Industrial Park, grading activities triggered a landslide involving one of the manufactured slopes. The Project

proposes 1.5 million cubic yards of cut and 1.5 million cubic yards of fill with approximately 25-percent of the development sited on slopes greater than 50-percent. The VTTM shows many of the proposed home sites above and below manufactured slopes and a manufactured slope above existing, off-site homes on Silver Street. Given the steep and demonstrated unstable terrain, the Draft EIR did not sufficiently propose alternatives that reduced the risk of landslide(s), did not propose alternative lot configurations to minimize home sites near manufactured slopes, and did not analyze impacts to off-site properties that could be affected by landslides originating from the proposed Project site.

Response 6-4:

The stability of the proposed cut and proposed fill slopes (manufactured slopes) and proposed natural slopes, including slopes proposed above existing off-site homes, noted on the Vesting Tentative Tract Map has been evaluated in the geotechnical reports referenced and summarized in Section 5.6: Geology and Soils, in the Draft EIR. These slope stability evaluations indicate the proposed manufactured slopes and natural slopes will conform with the County of Los Angeles factor of safety requirements for both static and pseudo static conditions. These slopes will have a minimal risk of adversely affecting future home sites at the Project site or off-site properties with implementation of the design recommendations in the approved geotechnical reports.

As discussed on page 5.6-15 of the Draft EIR, based on the Geotechnical Study prepared for the VTTM site and Off-Site Roadway Improvement Area (located in Appendix C of the Geotechnical Study in Appendix F.1 in the Draft EIR) as well as for the Off-site Water Tank Area (located in Appendix F.7 in the Draft EIR), the Project is feasible for development from a geotechnical perspective. No significant impacts were identified and for this reason, no mitigation measures are identified.

Prior to the issuance of grading or building permits, the compliance with the conditions contained within the Department of Public Works' Geology and Soils Report Approval Letter for the Project, and as it may be subsequently amended or modified by LACDW, will be required. Furthermore, the final grading, drainage, and erosion control plans must be reviewed and approved by the LACDPW before the County issues a grading permit. Therefore, impacts at the VTTM site, Off-Site Water Tank Area, and the Off-Site Roadway Improvement Area would be reduced to less than significant with compliance with these documents and implementation of County regulations.

Comment 6-5:

Further, the Project site's geologic setting is responsible for the petroleum deposits that have sustained an onsite petroleum extraction industry to the current day. Per the Draft EIR, subsurface exploration for groundwater determine its contact depth ranging from 20 feet to 45 feet and areas where groundwater is as shallow as 10 feet. However, the Draft EIR fails to analyze whether construction-related dewatering and/or operation-related surface flow following high rainfall events on the 3 million cubic yards of grading

would mobilize petro-chemicals in contaminated soils or groundwater or have the potential to contaminate water quality of the Santa Clara River.

Response 6-5:

Only one oil well, Fernando Oil Co. #1, is present within a narrow canyon area at the northwesterly area of the Project site. This oil well was drilled in 1922 and was not completed for production due to issues with a failure to seal the casing from water intrusion at depth below 3,575 ft. Therefore, the well was abandoned in 1923. Oil and gas were never produced from this well.

As discussed in the Draft EIR Section 5.8: Hazards and Hazardous Materials, geologic field mapping and subsurface explorations did not encounter odiferous or discolored soil, which would be an indication that impacted soils associated with previous oil exploration related activities were present at the Project site. Based on the limited oil production activities that occurred on the Project site and the results of the geotechnical field investigations, impacts related to mobilization of petro-chemicals in contaminated soils or groundwater that would have the potential to contaminate surface or ground water quality are not anticipated.

Comment 6-6:

As presented in the Draft EIR, "seasonally timed focused [biological] surveys of the VTTM site, Off-Site Roadway Improvement Area, and Off-Site Open Space Dedication Area were conducted in May and July 2017. Additionally, seasonally timed focused [biological] surveys of the [Project Area] were conducted in May 2020, June 2020, July 2020, and August 2020." Thus, the entirety of focused biological studies for this Project were conducted during extreme drought years. Because of the rainfall that has fallen in December 2021, additional spring and summer biological surveys are required to ensure a fuller accounting of habitat and wildlife that would be impacted by the Project.

Response 6-6:

The comment states surveys were conducted only in 2017 and 2020, and only during extreme drought years. The commenter suggests these surveys provide an insufficient accounting of habitat and wildlife and that additional spring and summer surveys should be conducted due to the rainfall in December 2021.

The 2017 focused botanical survey was completed in the spring and summer following an above-average rain year (NOAA 2022b). The 2020 focused botanical survey was completed in the spring and summer following an average rain year (NOAA 2022b). In addition, based on measurements through February 5, 2022, accumulated precipitation in the vicinity of the Project site for the 2021-2022 water year is 12.33 inches, which is less than the 13.57 inches of accumulated precipitation through the same date of the 2016-2017 water year (USDA 2022). Based on rainfall in December 2021, there is no reasonable basis to expect a fuller accounting of habitat and wildlife in 2022 than there was in 2017.

The surveys referred to in the comment, from 2017 and 2020, were conducted specifically to identify and map vegetation communities and land cover types, as described in the Draft EIR. Additional focused biological surveys were conducted in 2016, 2017, 2018, and 2020, as discussed in the Draft EIR, consisting of over 248 person hours. The National Oceanic and Atmospheric Administration's National Centers for Environmental Information shows that Los Angeles County experienced moderately wet conditions in 2017, 2019, and 2020 compared to climatological averages, as measured by the nine-month Standardized Precipitation Index (SPI) (NOAA 2022a).

Biological surveys completed in 2016, 2017 and 2018 of the VTTM site, Off-Site Roadway Area, and Off-Site Open Space Dedication Area and 2020 habitat assessment of the Off-Site Water Tank Area provide an adequate accounting of habitat and wildlife potentially present in the Project vicinity and provide a scientifically sound and reasonable basis for determining the occurrence potential of several special-status wildlife species within the Project site.

Comment 6-7:

Focused surveys for amphibians, such as the western spadefoot toad (*Spea hammondii*) that is known to exist within a half-mile to the east of the Project site, are especially critical following seasonal rain events. A development condition for the nearby Sterling Gateway Industrial Park was to construct and maintain an ephemeral pond and buffer zone for western spadefoot. Due to the proximity and similar habitat types, western spadefoot are likely to occur within the Project Area and similar mitigation should be required.

Response 6-7:

The commenter refers to mitigation requirements associated with the nearby Sterling Gateway Industrial Park required for impacts to western spadefoot (*Spea hammondii*) and suggests similar mitigation should be required for the Project due to the close proximity and similar habitats of the two project sites.

Western spadefoot is associated with microhabitats that support ephemeral or seasonal ponding. The western spadefoot life cycle requires a ponded or pooled area lasting a minimum of three weeks in order for the adult forms to emerge. At the Sterling Gateway Industrial Park, located approximately 0.5 mile southeast of the Project site, spadefoot tadpoles were reportedly observed in a detention basin. No similar structures are present on the Sterling Ranch Estates Project site. Although ephemeral waterways are present on the VTTM site, these features are linear in nature and do not provide the ponding necessary to support western spadefoot. No ephemeral or seasonal pools have been identified on the Project site during surveys conducted in 2016, 2017, 2018, and 2020, consisting of over 248 person hours. Surveys completed in January 2017 included an assessment of ponding habitat for potentially occurring special-status amphibian species. These surveys were timed to follow significant rain events when conditions for

ponding would be ideal. No ponding habitat was identified and no amphibians were detected within the VTTM biological study area during the January 2017 surveys.

The presence of suitable upland habitats on the Project site is not enough to indicate the presence of western spadefoot. Extended inundation periods are required for the western spadefoot to complete the aquatic phases of their life cycles and the Project site does not contain the mosaic of habitats that would support the life history of the western spadefoot. Amphibians, including western spadefoot, are not expected to occur on the VTTM site due to a lack of suitable aquatic habitat; therefore, approval and implementation of the Project would not result in significant impacts to western spadefoot and the mitigation suggested in this comment is not warranted.

Comment 6-8:

Areas south of Del Valle Road are known to contain a low shrub and grassland habitat termed "Palmer's goldenbush (*Ericameria palmeri*) scrub alliance" that typically blooms in late August through September and performs an essential habitat function as a late-season wildflower important to native pollinators. Supplemental biological surveys following a year of more seasonal rains should be required to ensure this unique and rare habitat is fully accounted for.

Response 6-8:

The commenter suggests additional surveys are needed to fully account for Palmer's goldenbush scrub (*Ericameria palmeri*) provisional alliance in areas south of Del Valle Road.

Between 2016 and 2020, Dudek biologists completed habitat suitability assessments, vegetation mapping, focused botanical and special-status plant species surveys, focused surveys for coastal California gnatcatcher and burrowing owl, and aquatic resource delineation surveys on the Project site to gain a clear understanding of natural resources present and to identify those species with a potential to occur based on the habitats present. Each of the surveys included an inventory of the plant and wildlife species encountered. The surveys were conducted during the known blooming period for target species and were timed to coincide with peak blooming based on regional conditions. The 2017 focused botanical survey was completed in the spring and summer following an above-average rain year (NOAA 2022b), including surveys in late July. The 2020 focused botanical survey was completed in the spring and summer following an average rain year, including multiple surveys in the month of August (NOAA 2022b). Palmer's goldenbush scrub provisional alliance present on the Project site would have been detected during these surveys and the surveys fully account for the potential for this vegetation community to occur on the Project site. Additionally, Palmer's goldenbush scrub is defined by the presence of Palmer's goldenbush, which is a shrub and therefore observable at any time of the year, regardless of blooming or recent seasonal weather patterns.

Comment 6-9:

Proper mitigation measures to avoid coastal sage scrub and chaparral (CSS/C) and compensate for loss of CSS/C and grassland habitat must be included in the Project. The Conservancy recommends a minimum mitigation ratio of 2:1 for temporary and permanent impacts to CSS/C, a minimum mitigation ratio of 2:1 for temporary and permanent impacts to native or non-native grasslands, and a minimum 3:1 mitigation ratio for temporary and permanent impacts to Palmer's goldenbush scrub habitat should supplemental surveys document additional occurrences within the Project site.

Response 6-9:

The commenter suggests measures are required to avoid coastal sage scrub and chaparral. The commenter also suggests compensatory mitigation is required for impacts to these vegetation communities and grassland habitat and recommends mitigation be at a minimum 2:1 ratio. The commenter recommends impacts to Palmer's goldenbush scrub provisional alliance be identified during supplemental surveys be mitigated at a minimum 3:1 ratio.

As described in the Draft EIR, of the 18 vegetation communities mapped on the Project site, one chaparral community, nine scrub communities, and three grass and herb dominated communities were identified (see Draft EIR Table 5.3-1). All of these vegetation communities, except one, are ranked by CDFW as either an S4 or S5 alliance and none are designated a sensitive vegetation community by Los Angeles County. An S4 ranking indicates that within California the alliance is apparently secure and not considered a sensitive vegetation community and an S5 ranking indicates that within California the alliance is demonstrably secure to ineradicable and not considered a sensitive vegetation community (CDFW 2021).

As discussed in the Draft EIR, the significance of impacts is gauged based on the Thresholds of Significance in the CEQA Guidelines Appendix G (see Draft EIR page 5.3-66). In particular, Threshold 5.3-2 considers whether a project will have a substantial adverse effect on any sensitive natural communities. Vegetation communities with S4 or S5 rankings are not considered sensitive by CDFW (CDFW 2021) and, therefore, impacts to these communities are not considered significant and do not require mitigation.

Palmer's goldenbush scrub provisional alliance is ranked by CDFW as an S3 Alliance (CDFW 2021), indicating this vegetation community is considered sensitive in California. As discussed in *Response 6-9*, extensive surveys have been conducted on the Project site, providing a full accounting of the biological resources present on site, including Palmer's goldenbush scrub, and, for this reason, supplemental surveys are not warranted. Palmer's goldenbush scrub comprises 6.7 acres of the VTTM site and 1.4 acres of the Off-Site Open Space Dedication Area, for a total of 8.2 acres. Project activities within the VTTM would potentially affect 6.7 acres of Palmer's goldenbush scrub. As discussed in the Draft EIR, to fully mitigate for 6.7 acres of direct impacts to Palmer's goldenbush scrub, compensatory mitigation would be required. Implementation of **MM 5.3-1 Conservation Easement** and **MM 5.3-17 Palmer's Goldenbush Scrub**

Mitigation would result in no net loss of Palmer's goldenbush scrub (1:1). Please note that **MM 5.3-17 Palmer's Goldenbush Scrub Mitigation** has been updated to include the preferred Palmer's goldenbush scrub mitigation option; see *Response 1-35* which includes edits to **MM 5.3-17 Palmer's Goldenbush Scrub Mitigation**.

Comment 6-10:

If replacement acreage for impacted habitat cannot be accomplished through onsite restoration, the Conservancy recommends the Project Applicant enter into an agreement with a conservation or parks agency–such as the Mountains Recreation and Conservation Authority–to acquire, preserve and/or restore appropriate habitat types of sufficient acreage.

Response 6-10:

Palmer's goldenbush scrub mitigation options, including both on-site and off-site mitigation options, were included in the Draft EIR to fully mitigate impacts to Palmer's goldenbush scrub. **MM 5.3-17 Palmer's Goldenbush Scrub Mitigation,** Option 3, which has been updated to Option 4, identifies that if on-site in-kind creation/enhancement and/or preservation and in-kind and out-of-kind preservation do not achieve a total of 3:1 mitigation, off-site in-kind habitat creation/enhancement would be incorporated to achieve a total of 3:1 mitigation. **MM 5.3-17 Palmer's Goldenbush Scrub Mitigation** has been revised to include the specific Land Veritas mitigation area that would be appropriate for the creation/enhancement of Palmer's goldenbush scrub. Per Land Veritas, the Curtis Property comprises approximately 140 acres in Los Angeles County. The Curtis Property is adjacent to the Angeles National Forest and along the upper Santa Clara River within the existing and historical range of sensitive species. Please see *Response 1-35* which includes edits to **MM 5.3-17 Palmer's Goldenbush Scrub Mitigation**.

Comment 6-11:

The Project developer is proposing to dedicate approximately 37.9 acres of APN 3271-005- 032 as compensatory open space in addition to the 41.3 acres of existing conservation easement over this same APN related to the development of nearby Sterling Gateway Industrial Park. This would leave a remainder of approximately 15.77 acres of APN 3271- 005-032 for future development of an exclusive "ranch home" development project. This scenario represents a textbook example of piecemeal development that will destroy the last remaining north/south habitat connection from areas north of the Project site southward to the Santa Clara River.

The County has designated the Santa Clara River as a Significant Ecological Area (SEA No. 20) that allows wildlife to migrate from the Pacific Ocean to the San Gabriel Mountains. However, if north/south connections to the Santa Clara River are blocked, then this SEA fails to perform its vital functions. The Santa Felicia SEA (SEA No. 21) is located northeast of the proposed Project and connects to the Angeles National Forest. Because significant impacts to the north/south connectivity to the Santa Clara River are already approved with the Newhall Ranch development project and expansion of the Chiquita Canyon

Landfill, remaining habitat connections to the Santa Clara River are of paramount importance to protect and preserve.

Response 6-11:

The Project is not "piecemeal development." While APN 3271-005-032 is designated in the County's General Plan as RL2 and zoned in the Los Angele County Zoning Code as A-2-2 and A-2-5, Light and Heavy Agricultural uses, the owner of APN 3271- 005-032 is not pursuing development of the 15.77 acres at this time. Any such development would be required to comply with County regulations and analyze and mitigate any impacts with such development.

The potential for the Project to affect wildlife corridors and habitat linkages is addressed in Section 5.3: Biological Resources in the Draft EIR, on pages 5.3-52-54 and pages 5.3-93 to 5.3-96. Please also refer to California Department of Fish and Wildlife *Responses 1-5* through *1-18*. Additionally, referring to *Response 1-8*, from a regional perspective, the community of Val Verde constrains access to available habitat to the south and southwest of the Project site, which constitutes some level of impediment to habitat connectivity. The existing residential communities of Val Verde, Castaic, and Hasley Canyon and the industrial park to the east of the Project site limit movement through the Project site. There are significant wildlife movement corridors and linkages in the region, including the Sierra Madre–Castaic Connection, which connect the Los Padres National Forest and Angeles National Forest, and the Santa Monica–Sierra Madre Connection, which stretches from the Santa Monica Mountains to the peaks of the Santa Susana Mountains and the Sierra Madres Ranges of the Los Padres National Forest (South Coast Wildlands 2008). Due to the existing development adjacent to the Project site, which already constrains wildlife movement, and the significant open space west of the Project site in the Los Padres National Forest, approval and implementation of the Project would not interfere substantially with migratory wildlife corridors or use of native wildlife nursery sites. As described in the Draft EIR, the Project also would provide a trail through open space areas, which likely would be used by wildlife.

Comment 6-12:

In addition to preserving the entirety of APN 3271-005-032, the Project must also include a permanent, long-term maintenance fund to support the persistence of this open space dedication as suitable habitat for mountain lion, mule deer, western spadefoot, gnatcatcher, and various other wildlife known to exist in the vicinity. Habitat connections to these seemingly remote locations are required to maintain the genetic diversity of various species as climate change and development continue to adversely affect listed, and candidate for listing, species protected by the California Endangered Species Act. Any open space dedication without a permanent maintenance fund obligation is incomplete and inadequate.

There are several options to ensure a permanent funding source to monitor and protect fee simple open spaces including a developer-funded long-term maintenance account, a landscape maintenance district, or a community facilities district. A guaranteed annual minimum $5,000 payment–indexed to a CPI (or

similar) inflation adjustor–must be included in a Home Owners' Association CC&R for non-tract-contiguous open space maintenance to cover decades of increasing pressures from humans and domestic pets.

Response 6-12:

As with the Sterling Industrial Project, the Project would provide an Endowment Fund so that the conservation easement grantee, whichever entity that might be, could maintain the preserved open space in perpetuity. The Project's homeowners' association would fund maintenance of the open space within the VTTM site.

Comment 6-13:

Currently, the only wildlife route through the Project would require a circuitous path using steep manufactured slopes and crossing the Project-expanded Del Valle Road. Years of genetic and tracking data indicate roads pose the most significant barriers to wildlife movement.

The range of alternatives evaluated by the Draft EIR did not include an adequate reduced environmental impact option and failed to analyze alternatives that include: (1) a dedicated north/south wildlife corridor connecting the northern, undeveloped off-site area to the southerly proposed open space and conservation easement areas, (2) a wildlife crossing structure of sufficient size to accommodate large mammals crossing Del Valle Road, and (3) retaining existing oak trees and increasing opportunities for native vegetation to grow in more and/or larger debris or infiltration basins in order to provide cover habitat for species to "leap frog" through the proposed Project site. Considering the total volume of grading required to build the Project as proposed, additional detention basins and a wildlife crossing structure would result in an insignificant deviation from the proposed Project.

A dedicated wildlife corridor would also provide opportunities to incorporate additional open space to help mitigate for urbanized heat island effects as climate change continues to raise temperatures in Southern California.

Response 6-13:

The potential for the Project to affect wildlife corridors and habitat linkages is addressed in Section 5.3: Biological Resources in the Draft EIR, on pages 5.3-52-54 and pages 5.3-93 to 5.3-96. Please also refer to California Department of Fish and Wildlife *Responses 1-5* through *1-18*. The analysis of the potential impacts of the Project on wildlife corridors and habitat linkages considered information from several studies including the South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion and The California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California studies. The Project site is not located within any of the important habitat linkage areas identified in these regional studies and the impact of the Project on wildlife corridors and habitat linkages was determined to be less than significant. As the impact of the Project in wildlife movement and corridors would be less than significant, the evaluation of alternatives for wildlife corridors as suggested in this comment is not

necessary or required. As described in the Draft EIR, the Project also would provide a trail through open space areas, which likely would be used by wildlife.

Comment 6-14:

The Conservancy is dismayed that the Project proposes private parks and trails that would exclude existing area residents. All parks and trails must be open to the public with bilingual (English and Spanish) signage indicating the public's right to use said parks and trails with appropriate rules of use.

Response 6-14:

The Project's compliance with the County's park requirements and standards is addressed in Section 5.14: Recreation in the Draft EIR.

As described in Section 3.0: Project Description of this Draft EIR, the Project would provide a residential community for single-family occupants within the community of Val Verde in the Castaic region of the Santa Clarita Valley. The Project would include the following recreational features: a 3.4-acre private recreation lot with a tot and a shade area with tables; a 0.2-acre private recreation pocket park; a private multi-use trail; and an off-site multi-use trail easement that would connect to the County's Del Valle trail, which would allow for greater access to and from the Project site. Pursuant to the County's Master Plan of Trails, the Project would improve Del Valle Road, which would facilitate in the implementation of the planned Class III bike route. Additionally, it is estimated the Project would add 686 permanent residents and nine job opportunities. These amenities would be available and open to the public but maintained by the Project's homeowners' association. These parks and trails are designated as "private" because they will be maintained by the homeowners' association not the County Department of Parks and Recreation.

CENTER *for* BIOLOGICAL DIVERSITY *Because life is good.*

January 10, 2022

Sent via email

Jodie Sackett
County of Los Angeles
Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012
Tel: 213-974-6411
jsackett@planning.lacounty.gov

Re: Draft Environmental Impact Report for Sterling Ranch Estates

Dear Mr. Sackett,

These comments are submitted on behalf of the Center for Biological Diversity (the "Center") regarding the Draft Environmental Impact Report ("DEIR") for the Sterling Ranch Estates Project ("Project"). After reviewing the DEIR, the Center is concerned about the Project's impacts to mountain lions (*Puma concolor*), wildlife connectivity, sensitive habitats, and wildfire risk, and that the DEIR does not adequately disclose or mitigate such impacts. 7-1

I. Background on the Center

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States. The Center and its members have worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Los Angeles County and throughout California. 7-2

I. The DEIR fails to adequately assess and mitigate impacts to mountain lions to less than significant.

A. Inadequate assessment of impacts to mountain lions

The DEIR fails to accurately describe assess the impacts of the Project to mountain lions, a candidate species under the California Endangered Species Act ("CESA"). As a candidate species, mountain lions are afforded the same protections as a listed species under CESA. Moreover, the California Environmental Quality Act ("CEQA") requires a "mandatory finding of significance" if there is substantial evidence in the record that the Project *may* cause a "wildlife *population* to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare or threatened species . . . ." (Guidelines § 15065a)(1).) This means that "a project is deemed to have a significant impact on the environment as a matter of law if it reduces the habitat of a species, or reduces the number or range of an endangered, rare, or threatened species. . . ." (*Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 792 fn. 12 [citing *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1273–1274].) Such a finding triggers a duty to consider and adopt all feasible alternatives or mitigation measures to reduce such impacts. (Pub. Res. Code § 21002.) In addition, under CESA, the County may not approve projects that could jeopardize the continued existence of these populations or result in destruction of essential habitat (Fish & Game Code § 2053(a)) and agencies must require that appropriate mitigation measures be implemented for projects that could destroy mountain lion habitat or impair connectivity (Fish & Game Code § 2054). 7-3

The DEIR states that mountain lions were not observed on the project site during surveys done by biologists. (DEIR at 5.3-82.) However, there is a wealth of data from the National Park Service ("NPS") that demonstrates their presence in and adjacent to the Project area. Maps of the NPS data are publicly available at www.flickr.com, and they clearly show that the area is used by mountain lions. Figure 1 shows the dispersal path of P-32 which crosses in or adjacent to the Project site. Figure 2 shows the home range of P-16 which includes areas in or adjacent to the Project site. 7-4

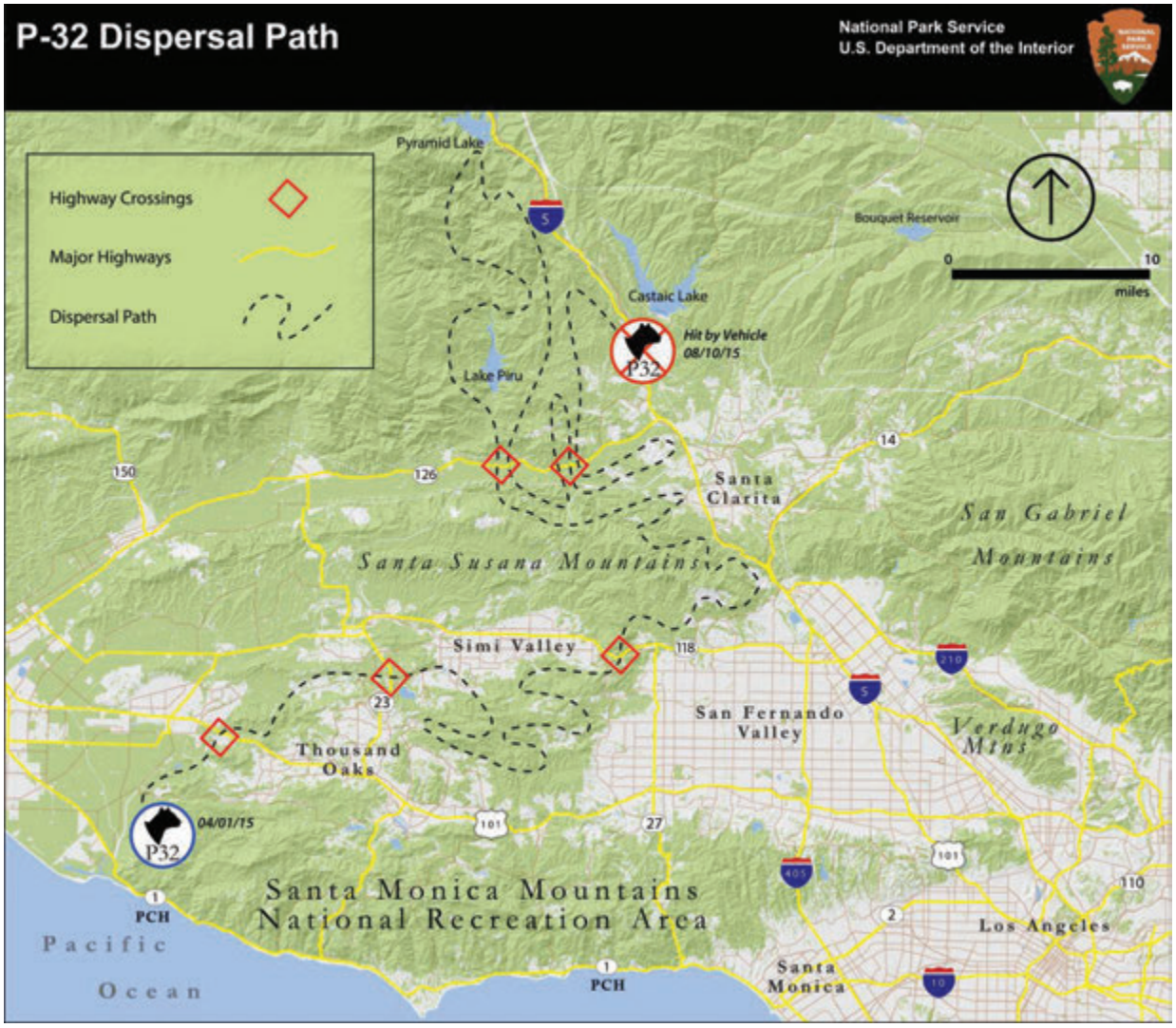


Figure 1: P-32 Dispersal Path (NPS 2015).

7-4

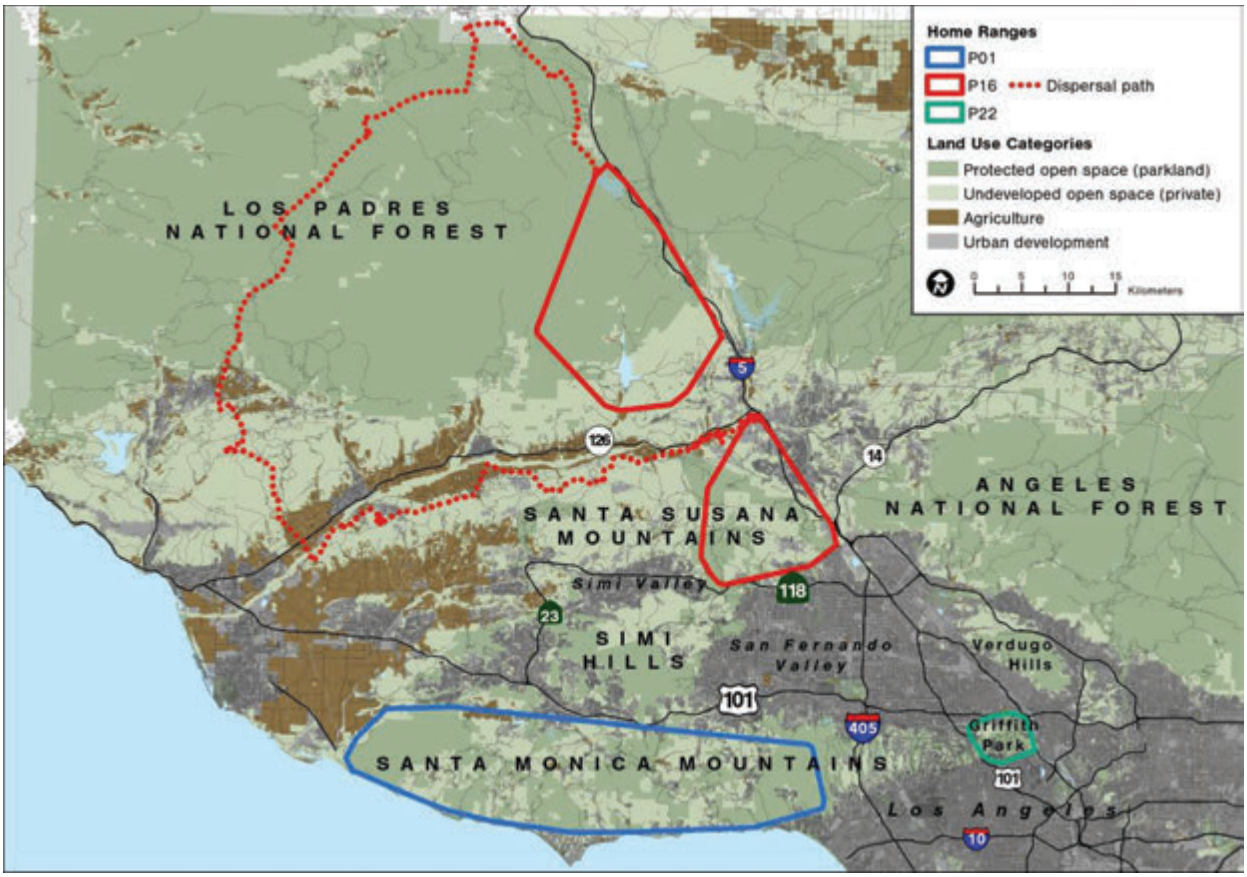


Figure 2: P-22 Home Range Comparison (NPS 2015).

7-4

In failing to adequately determine the presence of mountain lions in and near the Project site, the DEIR fails to adequately assess impacts to mountain lions. The Project has the potential to have significant impacts on struggling local mountain lions. Local mountain lions are at risk of extinction as their genetic health deteriorates due to inbreeding caused by roads and development slicing through their habitat and isolating populations (Ernest et al. 2014; Riley et al. 2014; Vickers et al. 2015; Gustafson et al. 2018; Benson et al. 2019). Low genetic diversity combined with high human-caused mortalities (*e.g.*, from car strikes, depredation kills, rodenticide poisoning, and poaching) threaten the long-term survival of several populations. Mountain lions in the Santa Monica Mountains are especially imperiled, as abnormalities linked with inbreeding depression was recently observed.[1] Should inbreeding depression occur, scientists predict there is a >99% chance of extinction, which could occur within as little as 15 years (Benson et al. 2019). Therefore, high quality habitat that is being used by mountain lions is critical for the population's long-term survival. The DEIR fails to adequately assess the severely low genetic diversity of the Santa Monica Mountains puma population and neighboring populations that is driven by isolation and the significant impacts the Project will have on this population by eliminating portions of its habitat and degrading connectivity in the area.

7-5

[1] News Release: NPS Biologists Report First Abnormalities Linked to Inbreeding Depression in Mountain Lions P-81, a Subadult Male, Has Reproductive and Tail Defects. Available at: https://www.nps.gov/samo/learn/news/first-abnormalities-linked-to-inbreeding-depression.htm

The DEIR fails to adequately disclose how the Project could impact mountain lion movement, behavior, and long-term survival and therefore fails to adequately assess the impacts to mountain lions in and around the Project area. There are many scientific studies that provide insights on the profound impacts human activities and infrastructure have on mountain lion survival, and they emphasize the need to adequately assess and mitigate impacts to these CESA candidate species in the Project area. There is cumulating scientific evidence that mountain lions require a habitat mosaic that provides sufficient room to roam away from human-disturbed areas and connected to expansive, intact, heterogeneous habitats (Beier et al. 1995; Dickson and Beier 2002; Dickson et al. 2005; Kertson et al. 2011; Zeller et al. 2017). Significant new development in this will limit the lions' ability to move through the area and drive them closer to extinction.

The DEIR does not appear to discuss the impacts of adding hundreds or thousands of additional people to the Project area. Adding hundreds of new would increase human activities in important mountain lion habitat, thereby increasing the chances of other direct impacts from things like vehicle strikes, rodenticide poisoning, increased fire ignitions, disease spread, poaching, etc.

The DEIR fails to consider the best available science regarding the Project's potential impacts to mountain lions. In a study conducted from 2002 to 2019 in the Santa Monica Mountains, Benson et al. (2020a) found high human-caused mortality rates in puma adults and high intraspecific mortalities among subadults. Most known causes of death among adults and subadults (14/20) were directly human-caused: vehicle strikes, rodenticide poisoning, poaching, and wildfire. The remaining six known causes of deaths were intraspecific killing (Benson et al. 2020a). And while intraspecific killings have been documented to naturally occur in mountain lion populations, they were likely exacerbated in the Santa Monica Mountains with the presence of significant movement barriers that prevent subadults from being able to adequately disperse, which likely led to increased conflicts with territorial males (Riley et al. 2014; Benson et al. 2020a). The Santa Monica Mountains puma population is relatively small, extremely isolated, and geographically limited. Demographic and environmental stochasticity and high mortality rates increase the risk of local extinction, particularly when combined with small population size, low density, female-biased sex ratios, and skewed male reproductive success (Ernest et al. 2014; Riley et al. 2014; Vickers et al. 2015; Benson et al. 2016a; Gustafson et al. 2018; Benson et al. 2019). Increased movement barriers and human-caused mortalities of adult males could lead to occasional male extinctions, which have been documented in the Santa Ana Mountains puma population (Beier and Barrett 1993). Lack of breeding males would disrupt reproduction and could severely limit the short- and long-term viability of a population (Beier 1993; Benson et al. 2016; Benson et al. 2019; Benson et al. 2020a). This highlights the need to reduce human-caused mortalities, in part, by improving connectivity and stopping the use of anticoagulant rodenticides. The proposed Project would increase movement barriers of an already extremely isolated mountain lion population.

7-5

Numerous studies highlight the impacts of human activities on mountain lions. For example, Shilling et al. (2019) reported 299 observed roadkill mountain lions throughout the state from 2015 to 2018, but these deaths are likely underreported. CDFW biologist Justin Dellinger estimates there could be 200 puma deaths on roads every year (Price 2020). And a recent University of California (UC) Davis special report identified a 58% reduction in mountain

lion road mortalities after a 71% decrease in road use due to COVID-19 pandemic "stay-at-home" orders (Nguyen et al. 2020). This report highlights how roads and traffic are deadly barriers to puma movement and gene flow. Therefore, vehicles traveling on roads used for the operation of the Project pose a threat to mountain lions in the area.

Human activities alter these large carnivores' behavior in ways that likely further impede important movement and gene flow that is important for their long-term survival. For example, Smith et al. (2017) found that mountain lions are so fearful of humans and noise generated by humans that they will abandon the carcass of a deer and forgo the feeding opportunity just to avoid humans.[2] The study concluded that even "non-consumptive forms of human disturbance may alter the ecological role of large carnivores by affecting the link between these top predators and their prey" (Smith et al. 2017). In addition, mountain lions have been found to respond fearfully upon hearing human vocalizations, avoiding the area and moving more cautiously when hearing humans (Smith et al. 2017; Suraci et al. 2019).

Other studies have demonstrated that mountain lion behavior is impacted when exposed to other evidence of human presence, such as noise, lighting, or vehicles/traffic (Wilmers et al. 2013; Smith et al. 2015; Wang et al. 2017). In addition, preliminary results from study by researchers at UC Davis and University of Southern California, as well as those by other researchers, suggest that the light, noise, and other aspects of roads can have negative impacts on wildlife numbers and diversity near the highways (Shilling 2020; Vickers 2020). Thus, roads, traffic, development, and other human activities have negative impacts on puma survival and behavior, which can reduce the genetic health of populations and ultimately diminish their chances of long-term survival.

7-5

Yovovich et al. (2020) documented the impacts of human activities on mountain lion communication and reproductive behaviors important for their survival. Males use scrapes to delineate territories as well as attract potential mates (Allen et al. 2015; Allen et al. 2016), and the males in the study preferred to use relatively flat areas away from human influence as scrape habitat (Yovovich et al. 2020). Similarly, when nursing females (with kittens less than 8 weeks old) shrank their home ranges to an average of 9 km^2 while their young were most vulnerable, they also selected undeveloped lands away from human disturbance, opting for habitat with protective cover and sufficient water and prey availability (Yovovich et al. 2020). The loss of adequate undisturbed communication and nursery habitat could disrupt important communication and reproductive behaviors that facilitate social structure and overall survival.

The DEIR fails to adequately assess the impacts of increased wildfire ignitions due to the Project on mountain lions. Most wildfires in California are caused by human ignitions, like power lines, arson, improperly disposed cigarette butts, debris burning, fireworks, campfires, or sparks from cars or equipment (Keeley and Syphard 2018). In fact, almost all (95-97%) contemporary wildfires in California are caused by humans and human infrastructure (Syphard et al. 2007; Balch et al. 2017; Keeley and Syphard 2018; Radeloff et al. 2018; Syphard and Keeley

7-6

[2] *See also* Sean Greene, "How a fear of humans affects the lives of California's mountain lions," *Los Angeles Times* (June 27, 2017), available at https://www.latimes.com/science/sciencenow/la-sci-sn-pumas-human-noise-20170627-story.html.

2019; Keeley and Syphard 2020; Syphard and Keeley 2020). In the Santa Monica Mountains, fires from 1978-2017 were often ignited near roads and other human infrastructure (Figure 3).

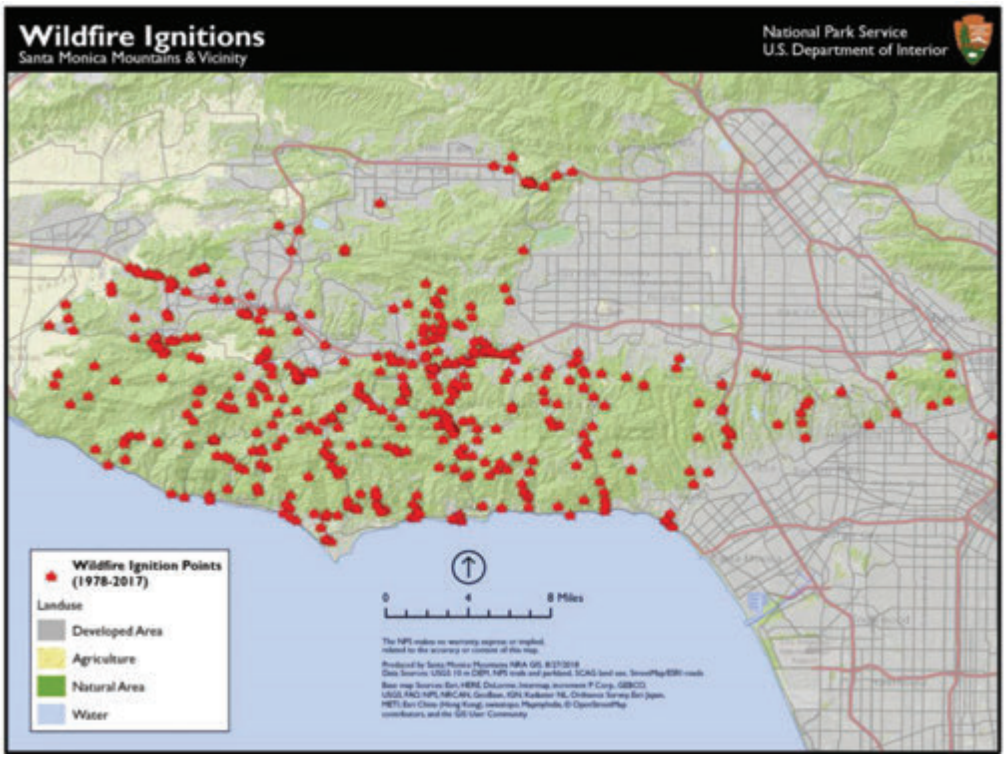


Figure 3: Wildfire Ignition Points in the Santa Monica Mountains and Vicinity (NPS 2018).

The Project would place more people and infrastructure and more human activity in high fire-prone areas, which would increase wildfire risk and threaten humans and nearby neighborhoods as well as mountain lions. Although mountain lions are highly mobile and generally able to move away from wildfires, in severe weather conditions wind-driven fires can spread quickly. The 2018 Hill Fire in Ventura County spread three miles in 15 minutes (County of Los Angeles 2019). If mountain lion movement is constrained by roads and development and the lions are unable to access escape routes, then their chances of surviving wildfires are greatly reduced. Two NPS-collared mountain lions, P-64 and P-74, were killed in the 2018 Woolsey Fire. Such stochastic events (*e.g.*, wildfires, flooding) could destabilize small mountain lion populations and make them more vulnerable to extinction (Benson et al. 2016a; Benson et al. 2019). The DEIR does not appear to consider and assess impacts of increased wildfire ignitions to mountain lions.

7-6

Mountain lions are a key indicator species of wildlife connectivity and healthy ecosystems. As the last remaining wide-ranging large carnivore in the region, the ability to move through large swaths of interconnected habitat is vital for genetic connectivity and their long-term survival. Local extinction of mountain lions in the region could have severe ecological consequences. Many scavengers, including many raptors, foxes, and numerous insects, would lose a reliable food source (Ruth and Elbroch 2014; Elbroch et al. 2017; Barry et al. 2019). Fish, birds, amphibians, reptiles, rare native plants, and butterflies could potentially diminish if this apex predator were lost (Ripple and Beschta 2006; Ripple and Beschta 2008; Ripple et al. 2014).

7-7

Loss of this ecosystem engineer and important predator-prey dynamics could have cascading effects on other plant and animal species, potentially leading to a decrease in biodiversity and diminished overall ecosystem function (Ripple et al. 2014; Elbroch et al. 2017; Barry et al. 2019; Benson et al. 2020b). 7-7

B. Mitigation Measures do not minimize impacts to mountain lions to less than significant

Because the DEIR incorrectly assumes that the Project would not have significant impacts on mountain lions, it fails to propose any mitigation for those impacts. As such, the DEIR fails to mitigate impacts to mountain lions to less than significant. This violates CEQA.

Mountain lions are nocturnal, elusive creatures that are difficult to find in the wild. They are so stealthy and secretive that lion sightings are rare despite the high numbers of outdoor recreationists in mountain lion habitat. They occur in low densities and have large home ranges. In California, resident adult and total population densities have been found to be 1.1 and 3.6 per 100 km^2, respectively (Pierce and Bleich 2003). Riley et al. (2014) found that mountain lions in the Santa Monica Mountains have home ranges of 100-200 km^2 for females and 300-500 km^2 for males. If one does not see a mountain lion or evidence of a mountain lion in the area, a lion could still be there using the site in some way. For example, a wildlife camera study conducted in the Northlake project area found no trace of mountain lions on the site, yet in November 2020 a mountain lion was recorded on a wildlife camera using a culvert adjacent to the site. Kitten dens are very well hidden in rocky outcrops or dense vegetation. Experts often find them because the mother has a GPS collar, and her behavior (*e.g.*, having a smaller home range, staying in one location frequently) can signal she has had kittens. Such dens could be easily missed during surveys, which could result in kittens being killed or orphaned if the mother is deterred by the blasting and abandons them. Simply conducting mountain lion surveys (with undisclosed protocols) is insufficient and inadequate mitigation. 7-8

More appropriate mitigation would be to work closely with mountain lion experts at NPS, who have been studying mountain lions in the area for almost 20 years, to determine if collared or tagged mountain lions are in the vicinity or using the area when vegetation clearing and ground disturbance is planned. They have the most on-the-ground data, knowledge, and experience regarding this mountain lion population, and have a critical understanding of both collared and uncollared lions in the area, and would be able to provide the best science-based guidance to minimize impacts to mountain lions. In addition, the Project must fully mitigate the impacts of the Project by permanently conserving habitat in the area at an appropriate ratio such as 10 to 1 (conserved:impacted), with a focus on habitat needed to ensure long-term connectivity.

II. The DEIR fails to adequately assess and mitigate impacts to wildlife movement and habitat connectivity to less than significant.

A. Inadequate assessment of impacts to wildlife movement and habitat connectivity 7-9

Roads and development create barriers that lead to habitat loss and fragmentation, which harms native wildlife, plants, and people. As barriers to wildlife movement, poorly-planned

development and roads can affect an animal's behavior, movement patterns, reproductive success, and physiological state, which can lead to significant impacts on individual wildlife, populations, communities, landscapes, and ecosystem function (Mitsch and Wilson 1996; Trombulak and Frissell 2000; van der Ree et al. 2011; Haddad et al. 2015; Marsh and Jaeger 2015; Ceia-Hasse et al. 2018). For example, habitat fragmentation from roads and development has been shown to cause mortalities and harmful genetic isolation in mountain lions in southern California (Ernest et al. 2014; Riley et al. 2014; Vickers et al. 2015), increase local extinction risk in amphibians and reptiles (Cushman 2006; Brehme et al. 2018), cause high levels of avoidance behavior and mortality in birds and insects (Benítez-López et al. 2010; Loss et al. 2014; Kantola et al. 2019), and alter pollinator behavior and degrade habitats (Trombulak and Frissell 2000; Goverde et al. 2002; Aguilar et al. 2008). Habitat fragmentation also severely impacts plant communities. An 18-year study found that reconnected landscapes had nearly 14% more plant species compared to fragmented habitats, and that number is likely to continue to rise as time passes (Damschen et al. 2019). The authors conclude that efforts to preserve and enhance connectivity will pay off over the long-term (Damschen et al. 2019). In addition, connectivity between high quality habitat areas in heterogeneous landscapes is important to allow for range shifts and species migrations as climate changes (Heller and Zavaleta 2009; Cushman et al. 2013; Krosby et al. 2018). Loss of wildlife connectivity decreases biodiversity and degrades ecosystems.

7-9

The DEIR fails to adequately describe the Project area's importance in wildlife connectivity. Although the DEIR acknowledges that the Project site is located adjacent to the Santa Monica-Sierra Madre Connection, the DEIR states that impacts would be less than significant. (DEIR at 5.3-96). The DEIR does not support this conclusion.

7-10

The proposed development will increase human activities in open space and further fragment the landscape, which could affect the diverse animals and plants in the area. For instance, field observations and controlled laboratory experiments have shown that traffic noise can significantly degrade habitat value for migrating songbirds (Ware et al. 2015). Subjects exposed to 55 and 61 dBA (simulated traffic noise) exhibited decreased feeding behavior and duration, as well as increased vigilance behavior (Ware et al. 2015). Such behavioral shifts increase the risk of starvation, thus decreasing survival rates. Another study also highlighted the detrimental impacts of siting development near areas protected for wildlife. The study noted that "Anthropogenic noise 3 and 10 dB above natural sound levels . . . has documented effects on wildlife species richness, abundance, reproductive success, behavior, and physiology" (Buxton et al. 2017). The study further noted that "there is evidence of impacts across a wide range of species [] regardless of hearing sensitivity, including direct effects on invertebrates that lack ears and indirect effects on plants and entire ecological communities (*e.g.*, reduced seedling recruitment due to altered behavior of seed distributors)" (Buxton et al. 2017). Moreover, human transportation networks and development resulted in high noise exceedances in protected areas (Buxton et al. 2017). Additional traffic, construction, and human activities caused by the Project has the potential to interfere with wildlife connectivity. The DEIR fails to adequately assess such impacts.

7-11

In addition, preliminary results from studies underway by researchers at UC Davis and University of Southern California, as well as those by other researchers, suggest that the light,

7-12

noise, and other aspects of roads can have negative impacts on wildlife numbers and diversity near the roadways (Shilling 2020; Vickers 2020). The researchers found a significant difference between species richness and species type, with lower richness and fewer species at along roadsides compared to background areas 1 km away from the roads (Shilling 2020). They also found that as traffic noises surpassed 60 dBC, the number of visits by small to large mammals decreased, and most of the species in their study avoid traffic noise (Shilling 2020). It is clear that different species have variable sensitivities to noise and light associated with development and transportation infrastructure; this can lead to changes in species distributions and population health and survival, which can have ecosystem-level impacts (*e.g*., Suraci et al. 2019). Again, the DEIR fails to adequately assess and mitigate impacts of edge effects on functional connectivity. 7-12

As the DEIR admits, the Project would potentially interfere with wildlife movement and remove access to suitable habitat patches and established nursery sites. (DEIR at 5.3-94.) Negative edge effects from human activity, traffic, lighting, noise, pollutants, invasive weeds, and increased fire frequency have been found to be biologically significant up to 300 meters (~1000 feet) away from development in terrestrial systems (Environmental Law Institute 2003). By eliminating available habitat, the Project would diminish local wildlife movement and the long-term viability of the Sierra Madre – Castaic Connection.

The DEIR claims impacts will be less than significant because the Sierra Madre – Castaic Connection "provide[s] largely undeveloped intact habitat for wildlife movement corridors and habitat linkages." (DEIR at 5.3-94.) This is inaccurate, as the County approved the 1,300-acre Northlake Specific Plan development within this linkage, despite objections from the Center, Santa Monica Mountains Conservancy, and other stakeholders that it would harm the linkage. The County cannot claim this Project does not have significant impacts by pointing to the Sierra Madre – Castaic Connection given that the County has not ensured the protection of that linkage and is approving other projects within the linkage. 7-13

The Project's placement will subject the limited surrounding open space to development edge effects and will likely impact key, wide-ranging predators, such as mountain lions and bobcats (Crooks 2002; Riley et al. 2006; Delaney et al. 2010; Lee et al. 2012; Vickers et al. 2015), as well as smaller species with poor dispersal abilities, such as song birds, small mammals, and herpetofauna (Cushman 2006; Benítez-López et al. 2010; Kociolek et al. 2011). Limiting movement and dispersal can affect species' ability to find food, shelter, mates, and refugia after disturbances like fires or floods. Individuals can die off, populations can become isolated, sensitive species can become locally extinct, and important ecological processes like plant pollination and nutrient cycling can be lost. In addition, linkages and corridors between major core habitat areas are important to allow for range shifts and species migrations as climate changes. Therefore, it is imperative that thorough analyses are conducted to determine if Project activities will affect species movement. The DEIR does not provide sufficient details and analyses to warrant their conclusion that Project impacts on habitat connectivity and wildlife movement would be mitigated to less than significant. 7-14

The DEIR does not adequately consider the need for corridor redundancy (*i.e*. the availability of alternative pathways for movement) or wider corridors. Wider corridors provide a level of corridor redundancy in that they help to ensure that appropriate habitat is available for 7-15

numerous species. Corridor redundancy is important because it allows for improved functional connectivity and resilience. Compared to a single or narrow pathway, multiple or wider connections between habitat patches increase the probability of movement across landscapes by a wider variety of species, and they provide more habitat for low-mobility species while still allowing for their dispersal (Mcrae et al., 2012; Olson & Burnett, 2008; Pinto & Keitt, 2008). In addition, corridor redundancy provides resilience to uncertainty, impacts of climate change, and extreme events, like flooding or wildfires, by providing alternate escape routes or refugia for animals seeking safety (Cushman et al., 2013; Mcrae et al., 2008; Mcrae et al., 2012; Olson & Burnett, 2008; Pinto & Keitt, 2008).

Corridor redundancy is critical when considering the impacts of climate change on wildlife movement and habitat connectivity. Climate change is increasing stress on species and ecosystems, causing changes in distribution, phenology, physiology, vital rates, genetics, ecosystem structure and processes, and increasing species extinction risk (Warren et al. 2011). A 2016 analysis found that climate-related local extinctions are already widespread and have occurred in hundreds of species, including almost half of the 976 species surveyed (Wiens 2016). A separate study estimated that nearly half of terrestrial non-flying threatened mammals and nearly one-quarter of threatened birds may have already been negatively impacted by climate change in at least part of their distribution (Pacifici et al. 2017). A 2016 meta-analysis reported that climate change is already impacting 82 percent of key ecological processes that form the foundation of healthy ecosystems and on which humans depend for basic needs (Scheffers et al. 2016). Genes are changing, species' physiology and physical features such as body size are changing, species are moving to try to keep pace with suitable climate space, species are shifting their timing of breeding and migration, and entire ecosystems are under stress (Parmesan and Yohe 2003; Root et al. 2003; Parmesan 2006; Chen et al. 2011; Maclean and Wilson 2011; Warren et al. 2011; Cahill et al. 2012). Therefore, functional habitat connectivity is critical for many animals and plants to adapt to climate change. Again, the DEIR fails to use the best available science and adequately assess and mitigate impacts to wildlife movement and functional connectivity.

7-15

B. Mitigation Measures do not minimize impacts to wildlife movement and habitat connectivity to less than significant

The Project has the potential to inhibit wildlife movement, and directly and indirectly impact special-status species like mountain lions. As mentioned previously, local mountain lions are facing an extinction vortex largely driven by lack of connectivity and human-caused mortalities. Encroaching on corridors in the Project area will further isolate local mountain lions and drive them closer to local extinction. The DEIR fails to adequately mitigate impacts to wildlife movement and habitat connectivity to less than significant. The DEIR offers no mitigation designed to ensure wildlife movement. While the DEIR does propose a limited about of conservation of open space, there is no analysis in the DEIR about how this will ensure that impacts to wildlife movement are less than significant. The Project should require far greater conservation of open space (e.g., 10 to 1 ratio) and describe how the conservation lands will ensure local wildlife connectivity for sensitive species.

7-16

III. The FEIR fails to adequately disclose, assess, and mitigate impacts to wildfire risk.

The EIR does not adequately disclose the impacts of the Project on wildfire risk. The Project is located in an area designated by CalFire as a Very High Fire Hazard Severity Zone. Such categorization indicates that the area is likely to burn within 30 to 50 years. As noted in the DEIR, there have been multiple wildfires on or near the Project area in the last fifty years. (DEIR at 5.18-4.)

CEQA requires an EIR to identify and analyze a project's significant environmental impacts, including those impacts caused or exacerbated "by bringing development and people into the area affected." (Pub. Resources Code, §§ 21002, 21002.1, subd. (a); CEQA Guidelines, § 15126.2, subd. (a).) The impacts of development in areas prone to wildfire specifically require consideration: "the EIR should evaluate any potentially significant direct, indirect, or cumulative environmental impacts of locating development in areas susceptible to hazardous conditions (e.g., floodplains, coastlines, *wildfire risk areas*), including both short-term and long-term conditions, as identified in authoritative hazard maps, risk assessments or in land use plans addressing such hazard areas." (CEQA Guidelines, § 15126.2, subd. (a), emphasis added.) 7-17

The state has recognized that introduction of low or intermediate density development in the Wildland Urban Interface increases ignition risk. (OPR 2018 Final Statement of Reasons – Update to CEQA Guidelines Checklist]; see also *Clews Land & Livestock, LLC v. City of San Diego* (2017) 19 Cal.App.5th 161, 193 [recognizing potential for significant environment effects when project brings new development to a wildfire prone area].) '

As discussed in a 2021 Center Report, "Built to Burn: California's Wildlands Developments are Playing with Fire," policymakers must reckon with California's wildfire history and acknowledge that reckless land-use policies are increasing wildfire risk and putting more people in harm's way (Yap et al., 2021). Since 2015 almost 200 people in the state have been killed in wildfires, more than 50,000 structures have burned down, hundreds of thousands have had to evacuate their homes and endure power outages, and millions have been exposed to unhealthy levels of smoke and air pollution. Meanwhile costs for fire suppression and damages have skyrocketed to more than $23 billion during the 2015-2018 fire seasons (Yap et al., 2021).

Almost all contemporary wildfires in California (95-97%) are caused by humans in the wildland urban interface (Balch et al., 2017; Radeloff et al., 2018; Syphard et al., 2007; Syphard & Keeley, 2020). For example, the 2019 Kincade Fire, 2018 Camp and Woolsey fires, and 2017 Tubbs and Thomas fires were sparked by powerlines or electrical equipment. And although many of the 2020 fires were sparked by a lightning storm, the Apple Fire was caused by sparks from a vehicle, the El Dorado Fire was caused by pyrotechnics at a gender-reveal celebration, the Blue Ridge Fire was likely caused by a house fire, and electrical equipment is suspected to have ignited the Silverado and Zogg fires. Clearly, placing more humans and human infrastructure in high fire-prone areas increase risk of igniting more fires. The DEIR fails to accurately disclose the increased wildfire risk caused by the Project and ultimately fails to adequately assess and mitigate such impacts.

Continued development in California's highly fire-prone Mediterranean shrublands and grasslands results in the continual release of large amounts of carbon into the atmosphere by removing significant carbon sinks, increasing wildfire frequency, and degrading habitats and ecosystem function. The past few decades have seen significant growth near natural areas in California's wildland urban interface (*i.e.*, the transition zone between human development and wildlands), including more than one million homes built between 1990 and 2010 (Radeloff et al., 2018). And scientists project that at least 640,000 to 1.2 million new homes will be built in the state's highest wildfire risk areas by 2050 under current land use practices (Mann et al., 2014). In addition, rampant fire suppression and logging since European colonization have led to an increase in wildfire intensity and spread when fires ignite, which leads to compounding carbon release events (Bradley et al., 2016; Hanson, 2020; Morrison, 2019).

Progressively hotter, drier, and windier conditions and more extreme weather events due to climate change are making it easier for wildfires to ignite and spread. The number of days with extreme fire weather conditions in California has doubled since 1980, and further climate change will amplify that trend (Goss et al., 2020). Although wildfires are a natural and necessary process in California's landscapes and much of the state's diverse shrubland communities in its Mediterranean ecosystems are adapted to a high severity infrequent wildfire regime, increases in fire frequency in these systems disrupt the historical fire regimes they have evolved with. This can lead to the establishment of more flammable non-native grasses that increase fire threat over time (Keeley, 2005, 2006; Safford & Van de Water, 2014; Syphard et al., 2009, 2018, 2019). Other disturbance and associated edge effects from roads and development, such as nitrogen deposition from vehicle emissions, can also lead to the establishment of such invasive grasses (Keeley et al., 2011) as well as reduced native biodiversity (Hernández et al., 2016). Thus, continued development in fire-prone wildlands has the potential to perpetuate a feedback loop of increased carbon release and wildfire that fuels climate change while eliminating and degrading California's Mediterranean native ecosystems. Southern California is especially vulnerable with development pressures to extend the wildland urban interface into adjacent high fire-prone shrublands. The Project as proposed could increase the risk of wildfire and contribute to this negative feedback loop.

7-17

Keeley and Syphard (2019) discuss a poignant and cautionary example: the 2017 Tubbs Fire and the 1964 Hanly Fire had very similar burned area footprints, yet the Tubbs fire burned over 5500 structures and killed at least 22 people while the 1964 Hanly Fire only burned about 100 structures and no one died. The authors suggest that the increased population and human infrastructure in the area led to an increased chance of human-caused ignitions during an extreme wind event (the Tubbs fire was caused by faulty electrical equipment on private property) and the sprawl development over the decades since 1964 put more people at risk (Keeley & Syphard, 2019). Such an example should be a glaring warning to the County's decisionmakers when development is being proposed in a high fire-prone area where wildfires recently burned, like the proposed Project. Wildfire experts are constantly and unambiguously pointing out the dangers of placing communities in high fire-prone areas, yet the DEIR fails to adequately disclose, assess, and mitigate wildfire impacts.

As discussed in the Center's 2021 Report, impacts of wildfire disproportionately affect low-income and minority communities (Yap et al., 2021). The report states:

7-18

Impacts of wildfire disproportionately affect vulnerable communities with less adaptive capacity to respond to and recover from hazards like wildfire. Low-income and minority communities, especially Native American, Black, Latinx and Southeast Asian communities, are the most marginalized groups when wildfires occur (Davies et al., 2018).

Past environmental hazards have shown that those in at-risk populations (*e.g.,* low-income, elderly, disabled, non-English-speaking, homeless) often have limited resources for disaster planning and preparedness (Richards, 2019). Vulnerable groups also have fewer resources to have cars to evacuate, buy fire insurance, implement defensible space around their homes, or rebuild, and they have less access to disaster relief during recovery (Davis, 2018; Fothergill & Peak, 2004; Harnett, 2018; Morris, 2019; Richards, 2019).

In addition, emergency services often miss at-risk individuals when disasters happen because of limited capacity or language constraints (Richards, 2019). For example, evacuation warnings are often not conveyed to disadvantaged communities (Davies et al., 2018). In the aftermath of wildfires and other environmental disasters, news stories have repeatedly documented the lack of multilingual evacuation warnings leaving non-English speakers in danger. (Axelrod, 2017; Banse, 2018; Gerety, 2015; Richards, 2019). Survivors are left without resources to cope with the death of loved ones, physical injuries and emotional trauma from the chaos that wildfires have inflicted on their communities.

7-18

Health impacts from wildfires, particularly increased air pollution from fine particulates ($PM_{2.5}$) in smoke, also disproportionately affect vulnerable populations, including low-income communities, people of color, children, the elderly and people with pre-existing medical conditions (Delfino et al., 2009; Hutchinson et al., 2018; Jones et al., 2020; Künzli et al., 2006; Reid et al., 2016).

Increased $PM_{2.5}$ levels during wildfire events have been associated with increased respiratory and cardiovascular emergency room visits and hospitalizations, which were disproportionately higher for low socioeconomic status communities and people of color (Hutchinson et al., 2018; Jones et al., 2020; Liu et al., 2017; Reid et al., 2016). Similarly, asthma admissions were found to have increased by 34% due to smoke exposure from the 2003 wildfires in Southern California, with elderly and child age groups being the most affected (Künzli et al., 2006).

Farmworkers, who are majority people of color, often have less access to healthcare due to immigration or economic status. They are more vulnerable to the health impacts of poor air quality due to increased exposure to air pollution as they work. Yet farmworkers often have to continue working while fires burn, and smoke fills the air, or risk not getting paid (Herrera, 2018; Kardas-Nelson et al., 2020; Parshley, 2018).

The DEIR fails to discuss how the Project will exacerbate these existing problems. 7-18

Finally, the EIR fails to disclose or analyze the Project's impact on the ability of community members to evacuate in the event of a wildfire. Courts have readily found EIRs invalid under CEQA due to the failure to describe and analyze the wildfire evacuation risk and to evaluate these questions. (*California Clean Energy Commission v. County of Placer* (Dec. 22, 2015, No. C072680), 2015 Cal. App. Unpub. LEXIS 9360, at *1].) In *California Clean Energy Commission*, the court found an EIR for a resort expansion plan deficient because it said "nothing about the impact of the increased population density created by the Project on emergency evacuations in the event a wildfire does occur, nothing about the effect of such evacuations on access for emergency responders and suggested no mitigation measures to address any such concerns." (*Id*. at *78.) The public—including future residents of the Project, and existing residents nearby who will be relying on existing roads for evacuation—have a right to know the full extent of the Project's impacts on wildfire evacuation. Among other things, the EIR should disclose:

- What are the pre- and post-Project expected evacuation times for residents (both Project residents and nearby affected existing residents) fleeing wildfire in the vicinity of the Project site?
- What will the Level of Service be for emergency egress routes from the Project vicinity in the event a wildfire-driven evacuation becomes necessary?
- What, if any, alternative evacuation routes will be available for residents and nearby community members in the event that Project-generated evacuation traffic makes pre-Project routes impassable?
- What effect will Project-resident evacuation have on the ability and timing for first responders who are responding to wildfire in the vicinity of the Project?

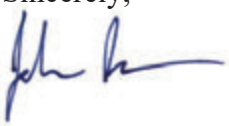
7-19

The EIR does not adequately disclose and mitigate the Project's direct and cumulative wildfire-related impacts to the environment, including future residents and existing communities.

IV. Conclusion

Thank you for the opportunity to submit comments on the Sterling Ranch Estates Project. Please include the Center on your notice list for all future updates to the Project and do not hesitate to contact us with any questions at the email listed below. 7-20

Sincerely,



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(*Provided via OneDrive*)

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COMMENT LETTER NO. 7:

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Comment 7-1:

These comments are submitted on behalf of the Center for Biological Diversity (the "Center") regarding the Draft Environmental Impact Report ("Draft EIR") for the Sterling Ranch Estates Project ("Project"). After reviewing the Draft EIR, the Center is concerned about the Project's impacts to mountain lions (*Puma concolor*), wildlife connectivity, sensitive habitats, and wildfire risk, and that the Draft EIR does not adequately disclose or mitigate such impacts.

Response 7-1:

Please see the responses below to the individual comments on these topics.

Comment 7-2:

I. Background on the Center

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States. The Center and its members have worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Los Angeles County and throughout California.

Response 7-2:

This comment describes the Center for Biological Diversity's background and mission. This comment does not address the information, analysis, or conclusions in the Draft EIR, and, for this reason, no further response is necessary.

Comment 7-3:

I. The Draft EIR fails to adequately assess and mitigate impacts to mountain lions to less than significant.

A. Inadequate assessment of impacts to mountain lions

The Draft EIR fails to accurately describe assess [SIC] the impacts of the Project to mountain lions, a candidate species under the California Endangered Species Act ("CESA"). As a candidate species, mountain lions are afforded the same protections as a listed species under CESA. Moreover, the California Environmental Quality Act ("CEQA") requires a "mandatory finding of significance" if there is substantial

evidence in the record that the Project *may* cause a "wildlife *population* to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare or threatened species . . . ." (Guidelines § 15065a)(1)). This means that "a project is deemed to have a significant impact on the environment as a matter of law if it reduces the habitat of a species, or reduces the number or range of an endangered, rare, or threatened species. . . ." (*Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 792 fn. 12 [citing *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1273–1274]). Such a finding triggers a duty to consider and adopt all feasible alternatives or mitigation measures to reduce such impacts. (Pub. Res. Code § 21002.) In addition, under CESA, the County may not approve projects that could jeopardize the continued existence of these populations or result in destruction of essential habitat (Fish & Game Code § 2053(a)) and agencies must require that appropriate mitigation measures be implemented for projects that could destroy mountain lion habitat or impair connectivity (Fish & Game Code § 2054).

Response 7-3:

The potential impacts of the Project to mountain lions are analyzed in Section 5.3: Biological Resources, under Threshold 5.3-1, of the Draft EIR.

Please see the *Responses 1-5* through *1-13* responding to the California Department of Fish and Wildlife for additional information on the presence of mountain lions on and near the Project site and the potential for the Project to impact mountain lions. As indicated in these responses, based on the suitability of the habitat on the site for mountain lions, the pattern of land uses around and near the site, and the documented range of mountain lions in the area, the Project would not result in significant direct impacts to mountain lions. Based on consultation with the California Department of Fish and Wildlife, the Final EIR identifies that the Project will contribute to a significant cumulative impact on mountain lion movement and mitigation for the contribution of the Project to this significant cumulative impact is also identified. For these reasons, the Project would not cause the population of mountain lions in southern California to drop below self-sustaining levels, result in direct impacts to mountain lions, or substantially reduce the number or restrict the range of mountain lions.

Comment 7-4:

The Draft EIR states that mountain lions were not observed on the project site during surveys done by biologists. (Draft EIR at 5.3-82.) However, there is a wealth of data from the National Park Service ("NPS") that demonstrates their presence in and adjacent to the Project area. Maps of the NPS data are publicly available at www.flickr.com, and they clearly show that the area is used by mountain lions. Figure 1 shows the dispersal path of P-32 which crosses in or adjacent to the Project site. Figure 2 shows the home range of P-16 which includes areas in or adjacent to the Project site.

Response 7-4:

Please see the *Responses 1-5* through *1-13* responding to the California Department of Fish and Wildlife. These responses include discussion of the results of long-term radio collar tracking studies of mountain lions in the area, including information from a study published in November 2021. This comprehensive study, based on fourteen years of GPS collar telemetry data and modeling, included the Project site and the surrounding area and did not identify a mountain lion on the Project site using telemetry data. One adult male established a home range to the west of the Project site, but never entered the Project site over the 14-year study period.

Comment 7-5:

In failing to adequately determine the presence of mountain lions in and near the Project site, the Draft EIR fails to adequately assess impacts to mountain lions. The Project has the potential to have significant impacts on struggling local mountain lions. Local mountain lions are at risk of extinction as their genetic health deteriorates due to inbreeding caused by roads and development slicing through their habitat and isolating populations (Ernest et al. 2014; Riley et al. 2014; Vickers et al. 2015; Gustafson et al. 2018; Benson et al. 2019). Low genetic diversity combined with high human-caused mortalities (*e.g.*, from car strikes, depredation kills, rodenticide poisoning, and poaching) threaten the long-term survival of several populations. Mountain lions in the Santa Monica Mountains are especially imperiled, as abnormalities linked with inbreeding depression was recently observed. Should inbreeding depression occur, scientists predict there is a >99% chance of extinction, which could occur within as little as 15 years (Benson et al. 2019). Therefore, high quality habitat that is being used by mountain lions is critical for the population's long-term survival. The Draft EIR fails to adequately assess the severely low genetic diversity of the Santa Monica Mountains puma population and neighboring populations that is driven by isolation and the significant impacts the Project will have on this population by eliminating portions of its habitat and degrading connectivity in the area.

The Draft EIR fails to adequately disclose how the Project could impact mountain lion movement, behavior, and long-term survival and therefore fails to adequately assess the impacts to mountain lions in and around the Project area. There are many scientific studies that provide insights on the profound impacts human activities and infrastructure have on mountain lion survival, and they emphasize the need to adequately assess and mitigate impacts to these CESA candidate species in the Project area. There is cumulating scientific evidence that mountain lions require a habitat mosaic that provides sufficient room to roam away from human-disturbed areas and connected to expansive, intact, heterogeneous habitats (Beier et al. 1995; Dickson and Beier 2002; Dickson et al. 2005; Kertson et al. 2011; Zeller et al. 2017). Significant new development in this will limit the lions' ability to move through the area and drive them closer to extinction.

The Draft EIR does not appear to discuss the impacts of adding hundreds or thousands of additional people to the Project area. Adding hundreds of new would increase human activities in important mountain lion habitat, thereby increasing the chances of other direct impacts from things like vehicle strikes, rodenticide poisoning, increased fire ignitions, disease spread, poaching, etc.

The Draft EIR fails to consider the best available science regarding the Project's potential impacts to mountain lions. In a study conducted from 2002 to 2019 in the Santa Monica Mountains, Benson et al. (2020a) found high human-caused mortality rates in puma adults and high intraspecific mortalities among subadults. Most known causes of death among adults and subadults (14/20) were directly human-caused: vehicle strikes, rodenticide poisoning, poaching, and wildfire. The remaining six known causes of deaths were intraspecific killing (Benson et al. 2020a). And while intraspecific killings have been documented to naturally occur in mountain lion populations, they were likely exacerbated in the Santa Monica Mountains with the presence of significant movement barriers that prevent subadults from being able to adequately disperse, which likely led to increased conflicts with territorial males (Riley et al. 2014; Benson et al. 2020a). The Santa Monica Mountains puma population is relatively small, extremely isolated, and geographically limited. Demographic and environmental stochasticity and high mortality rates increase the risk of local extinction, particularly when combined with small population size, low density, female-biased sex ratios, and skewed male reproductive success (Ernest et al. 2014; Riley et al. 2014; Vickers et al. 2015; Benson et al. 2016a; Gustafson et al. 2018; Benson et al. 2019). Increased movement barriers and human-caused mortalities of adult males could lead to occasional male extinctions, which have been documented in the Santa Ana Mountains puma population (Beier and Barrett 1993). Lack of breeding males would disrupt reproduction and could severely limit the short- and long-term viability of a population (Beier 1993; Benson et al. 2016; Benson et al. 2019; Benson et al. 2020a). This highlights the need to reduce human-caused mortalities, in part, by improving connectivity and stopping the use of anticoagulant rodenticides. The proposed Project would increase movement barriers of an already extremely isolated mountain lion population.

Numerous studies highlight the impacts of human activities on mountain lions. For example, Shilling et al. (2019) reported 299 observed roadkill mountain lions throughout the state from 2015 to 2018, but these deaths are likely underreported. CDFW biologist Justin Dellinger estimates there could be 200 puma deaths on roads every year (Price 2020). And a recent University of California (UC) Davis special report identified a 58% reduction in mountain lion road mortalities after a 71% decrease in road use due to COVID-19 pandemic "stay-at-home" orders (Nguyen et al. 2020). This report highlights how roads and traffic are deadly barriers to puma movement and gene flow. Therefore, vehicles traveling on roads used for the operation of the Project pose a threat to mountain lions in the area.

Human activities alter these large carnivores' behavior in ways that likely further impede important movement and gene flow that is important for their long-term survival. For example, Smith et al. (2017) found that mountain lions are so fearful of humans and noise generated by humans that they will abandon the carcass of a deer and forgo the feeding opportunity just to avoid humans. The study concluded that even "non-consumptive forms of human disturbance may alter the ecological role of large carnivores by affecting the link between these top predators and their prey" (Smith et al. 2017). In addition, mountain lions have been found to respond fearfully upon hearing human vocalizations, avoiding the area and moving more cautiously when hearing humans (Smith et al. 2017; Suraci et al. 2019).

Other studies have demonstrated that mountain lion behavior is impacted when exposed to other evidence of human presence, such as noise, lighting, or vehicles/traffic (Wilmers et al. 2013; Smith et al.

2015; Wang et al. 2017). In addition, preliminary results from study by researchers at UC Davis and University of Southern California, as well as those by other researchers, suggest that the light, noise, and other aspects of roads can have negative impacts on wildlife numbers and diversity near the highways (Shilling 2020; Vickers 2020). Thus, roads, traffic, development, and other human activities have negative impacts on puma survival and behavior, which can reduce the genetic health of populations and ultimately diminish their chances of long-term survival.

Yovovich et al. (2020) documented the impacts of human activities on mountain lion communication and reproductive behaviors important for their survival. Males use scrapes to delineate territories as well as attract potential mates (Allen et al. 2015; Allen et al. 2016), and the males in the study preferred to use relatively flat areas away from human influence as scrape habitat (Yovovich et al. 2020). Similarly, when nursing females (with kittens less than 8 weeks old) shrank their home ranges to an average of 9 km^2 while their young were most vulnerable, they also selected undeveloped lands away from human disturbance, opting for habitat with protective cover and sufficient water and prey availability (Yovovich et al. 2020). The loss of adequate undisturbed communication and nursery habitat could disrupt important communication and reproductive behaviors that facilitate social structure and overall survival.

Response 7-5:

Please see the *Responses 1-5* through *1-15*, particularly *Response 1-7*, responding to the California Department of Fish and Wildlife, for additional information on the potential for the Project to impact mountain lions, including the potential for the type of anthropogenic (i.e., human) impacts discussed in this comment on mountain lion individuals that may be within the Project site or its vicinity.

Fire Ignition Frequency

Development in WUI areas does not mean more wildfires as a result of increased human activity and likelihood of ignition (Keeley and Syphard, 2018; Syphard et al., 2007; Syphard and Keeley, 2015). Residential developments in fire-prone areas are commonly characterized as the principal driver of wildfire risk (Keeley and Syphard, 2018; Syphard et al., 2007; Syphard and Keeley, 2015). However, just as humans can drive wildfire risk, they can, in turn, reduce wildfire risk both to structures and the environment. In fact, it is the decisions made at the household or property level, such as home siting, building materials, and landscape design, which can reduce risk in the WUI environment (Newman et al., 2013). When wildfire is anticipated and defensive and protective features are incorporated into community design, the community is not only able to withstand fire but also to prevent it, thus lowering the impact to surrounding communities, the environment and wildlife habitat.

A common source of wildfire ignition stems from human activities such as smoking, playing with fire, and powerlines (Keeley and Syphard, 2018). Human-caused ignitions peaked in 1980 and have since dropped likely due to increased efficiencies in fire prevention, changes in infrastructure, a decline in smoking, and new developmental rules (Keeley and Syphard, 2018). The Project would not introduce humans to an area

that is devoid of human influences as the area includes considerable human presence currently in the areas adjacent to the Project site.

Irrigated fuel modification zones would be positioned throughout the development as well as the fuel modification zones on the perimeter of the Project. Irrigated zones include plants with high internal moisture and spacing between plants and plant groups that make it difficult to ignite and difficult for fire to spread plant to plant. The Project would convert all fuels within the footprint and would provide a wide, managed fuel modification zone separating homes from unmaintained fuel.

In addition to its numerous wildfire prevention measures, the Project would include an HOA, which would be responsible for long-term funding and maintenance responsibility for vegetation management for all common areas of the Project site, roadside clearance, and fuel modification zones. The Project's HOA also would ensure private homeowners' lots comply with this plan on an ongoing basis.

When developments are planned accordingly, such as the Project, the vegetation biomass, and fuel continuity decrease, while the probability of fire extinguishing increases (Fox et al., 2018). While human activities and densities influence fire frequency, the relationship is non-linear and makes it difficult to establish a simple relationship as many would perceive (Fox et al., 2018). Just because a community is being built in an area that includes a fire hazard designation, its presence would not necessarily result in a catastrophic wildfire.

The dual benefit of building a fire-hardened community is that the same features that protect the community from wildfire also play a significant role in protecting wildlands from Project-related fires and minimize the potential for fire escaping the site into the wildland areas. The protections that starve wildfire of fuels and minimize or prevent wildfire from entering a community with high maintenance levels, also serve to minimize or prevent on-site fires from transitioning into the wildlands.

Wildfire Mountain Lion Habitat Impacts

According to research conducted by the U.S Department of Agriculture, the ranges of large mammals such as mountain lions are not significantly impacted by wildfire, and instead they usually return to burned areas in search of prey. "Their populations change little in response to fire, but they tend to thrive in areas where their preferred prey or forage is most plentiful—often, in recent burns" (Smith 2000).[23] In fact, many studies indicate that the movement of large mammals is towards burned areas because of the abundance of food (Smith 2000). In addition, their familiarity with the area before it was burned also draws

23 Smith, Jane Kapler, ed. 2000. Wildland fire in ecosystems: effects of fire on fauna. Gen. Tech. Rep. RMRS-GTR-42-vol. 1. Ogden, UT: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, P. 29.

them back to their original habitat (Smith 2000). With stand-replacing fires in chaparral the mule deer population often increases due to the increased availability of fresh sprouts (Smith 2000). Since mule deer are their favored prey, mountain lions follow the deer to the burned areas.

In contrast, the same Smith study states "When fire frequency increases or decreases substantially or fire severity changes from presettlement patterns, habitat for many animal species declines." While the Project may in fact become the source of an occasional wildfire, it is unlikely that the frequency would be such as to significantly impact the habitat to the point where animal species decline. Hence, the contextual reference above (the movement of large mammals toward burned areas) are related to the potential impacts of a single fire.

A study conducted in 2003 following large fire events in San Diego County found that mountain lions (and other large mammal populations) all recovered within three years. In addition, their numbers were essentially unchanged from before the fire, and deer numbers seem to increase due to accessibility to abundant and more nutritious forage. "Though larger mammals may temporarily seek new habitat after a fire, over time they seem unaffected" (Funke 2018).[24]

To clarify, the Funke article is focused on the effects of fires occurring in areas unburned for many decades. Since the natural processes affecting habitat ecology create a dynamic mosaic of vegetation types, the ultimate footprint of most wildland fires may include areas that have never burned before, or that have burned many times in the past. The applicability of the referenced study should be included as an example for consideration, as the body of relevant work for this topic is still building.

The term "increase in frequency" is relative with no specific timeframe or location attached. It is important to note the applicability of all related studies, not selective studies that may only reference certain aspects. Even a single fire could be considered an "increase in frequency" for a site that has no record of previously being burned.

Smaller populations of animals, such as the mountain lion population is locally, would be more vulnerable to wildfire occurrence. However, no studies were identified that specifically address population impacts from wildfire when assessing "small" versus "large" mountain lion populations. The study cited (Gleason) is referencing the potential mortality of animals in a single wildfire event. Whether from the active wildfire (flames, heat, smoke), or the after effects (loss of habitat, food supply, soil erosion, water quality), all potential impacts should be included when referring to a "fire event."

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24 Funke, Sandi, 2018, Fire Ecology for Non-Scientists: Fire and Wildland Animal Habitat, https://www.pepperwoodpreserve.org/2018/03/07/fire-ecology-for-non-scientists-fire-and-wildland-animal-habitat/.

The potential indirect impacts on mountain lions from the increase in human activity that would be associated with the Project has been determined to be less than significant with incorporation of the proposed mitigation measures into the Project.

Comment 7-6:

The Draft EIR fails to adequately assess the impacts of increased wildfire ignitions due to the Project on mountain lions. Most wildfires in California are caused by human ignitions, like power lines, arson, improperly disposed cigarette butts, debris burning, fireworks, campfires, or sparks from cars or equipment (Keeley and Syphard 2018). In fact, almost all (95-97%) contemporary wildfires in California are caused by humans and human infrastructure (Syphard et al. 2007; Balch et al. 2017; Keeley and Syphard 2018; Radeloff et al. 2018; Syphard and Keeley 2019; Keeley and Syphard 2020; Syphard and Keeley 2020). In the Santa Monica Mountains, fires from 1978-2017 were often ignited near roads and other human infrastructure (Figure 3).

The Project would place more people and infrastructure and more human activity in high fire-prone areas, which would increase wildfire risk and threaten humans and nearby neighborhoods as well as mountain lions. Although mountain lions are highly mobile and generally able to move away from wildfires, in severe weather conditions wind-driven fires can spread quickly. The 2018 Hill Fire in Ventura County spread three miles in 15 minutes (County of Los Angeles 2019). If mountain lion movement is constrained by roads and development and the lions are unable to access escape routes, then their chances of surviving wildfires are greatly reduced. Two NPS-collared mountain lions, P-64 and P-74, were killed in the 2018 Woolsey Fire. Such stochastic events (*e.g.*, wildfires, flooding) could destabilize small mountain lion populations and make them more vulnerable to extinction (Benson et al. 2016a; Benson et al. 2019). The Draft EIR does not appear to consider and assess impacts of increased wildfire ignitions to mountain lions.

Response 7-6:

Please see *Response 7-17*, below, regarding the potential for the Project to increase wildfire risks.

Comment 7-7:

Mountain lions are a key indicator species of wildlife connectivity and healthy ecosystems. As the last remaining wide-ranging large carnivore in the region, the ability to move through large swaths of interconnected habitat is vital for genetic connectivity and their long-term survival. Local extinction of mountain lions in the region could have severe ecological consequences. Many scavengers, including many raptors, foxes, and numerous insects, would lose a reliable food source (Ruth and Elbroch 2014; Elbroch et al. 2017; Barry et al. 2019). Fish, birds, amphibians, reptiles, rare native plants, and butterflies could potentially diminish if this apex predator were lost (Ripple and Beschta 2006; Ripple and Beschta 2008; Ripple et al. 2014). Loss of this ecosystem engineer and important predator-prey dynamics could have cascading effects on other plant and animal species, potentially leading to a decrease in biodiversity and diminished overall ecosystem function (Ripple et al. 2014; Elbroch et al. 2017; Barry et al. 2019; Benson et al. 2020b).

Response 7-7:

The potential for the Project to affect wildlife corridors and habitat linkages is addressed in Section 5.3: Biological Resources in the Draft EIR, on pages 5.3-52 to 5.3-54 and pages 5.3-93 to 5.3-96. The analysis of the potential for the Project on wildlife corridors and habitat linkages considered information from several studies including the South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion and The California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California studies. The Project site is not located within any of the important habitat linkage areas identified in these regional studies and the impact of the Project on wildlife corridors and habitat linkages was determined to be less than significant.

Please also see Responses *1-5* through *1-13*, responding to the California Department of Fish and Wildlife. Based on the location of the Project site, the pattern of existing land uses around the site and the existing regional habitat linkages in the area, the direct impact of the Project on mountain lions was determined to be less than significant. The Project will, however, contribute to a significant cumulative impact on mountain lion movement and mitigation for the contribution of the Project to this cumulative impact is identified.

Comment 7-8:

B. Mitigation Measures do not minimize impacts to mountain lions to less than significant

Because the Draft EIR incorrectly assumes that the Project would not have significant impacts on mountain lions, it fails to propose any mitigation for those impacts. As such, the Draft EIR fails to mitigate impacts to mountain lions to less than significant. This violates CEQA.

Mountain lions are nocturnal, elusive creatures that are difficult to find in the wild. They are so stealthy and secretive that lion sightings are rare despite the high numbers of outdoor recreationists in mountain lion habitat. They occur in low densities and have large home ranges. In California, resident adult and total population densities have been found to be 1.1 and 3.6 per 100 km^2, respectively (Pierce and Bleich 2003). Riley et al. (2014) found that mountain lions in the Santa Monica Mountains have home ranges of 100-200 km^2 for females and 300-500 km^2 for males. If one does not see a mountain lion or evidence of a mountain lion in the area, a lion could still be there using the site in some way. For example, a wildlife camera study conducted in the Northlake project area found no trace of mountain lions on the site, yet in November 2020 a mountain lion was recorded on a wildlife camera using a culvert adjacent to the site. Kitten dens are very well hidden in rocky outcrops or dense vegetation. Experts often find them because the mother has a GPS collar, and her behavior (*e.g.*, having a smaller home range, staying in one location frequently) can signal she has had kittens. Such dens could be easily missed during surveys, which could result in kittens being killed or orphaned if the mother is deterred by the blasting and abandons them. Simply conducting mountain lion surveys (with undisclosed protocols) is insufficient and inadequate mitigation.

More appropriate mitigation would be to work closely with mountain lion experts at NPS, who have been studying mountain lions in the area for almost 20 years, to determine if collared or tagged mountain lions are in the vicinity or using the area when vegetation clearing and ground disturbance is planned. They have the most on-the-ground data, knowledge, and experience regarding this mountain lion population, and have a critical understanding of both collared and uncollared lions in the area and would be able to provide the best science-based guidance to minimize impacts to mountain lions. In addition, the Project must fully mitigate the impacts of the Project by permanently conserving habitat in the area at an appropriate ratio such as 10 to 1 (conserved:impacted), with a focus on habitat needed to ensure long-term connectivity.

Response 7-8:

Please see *Responses 1-5* through *1-13*, responding to the California Department of Fish and Wildlife. As discussed in these responses, the Project will contribute to a significant cumulative impact on mountain lion movement and mitigation for the contribution of the Project to this cumulative impact is identified.

Comment 7-9:

II. The Draft EIR fails to adequately assess and mitigate impacts to wildlife movement and habitat connectivity to less than significant.

A. Inadequate assessment of impacts to wildlife movement and habitat connectivity

Roads and development create barriers that lead to habitat loss and fragmentation, which harms native wildlife, plants, and people. As barriers to wildlife movement, poorly-planned development and roads can affect an animal's behavior, movement patterns, reproductive success, and physiological state, which can lead to significant impacts on individual wildlife, populations, communities, landscapes, and ecosystem function (Mitsch and Wilson 1996; Trombulak and Frissell 2000; van der Ree et al. 2011; Haddad et al. 2015; Marsh and Jaeger 2015; Ceia-Hasse et al. 2018). For example, habitat fragmentation from roads and development has been shown to cause mortalities and harmful genetic isolation in mountain lions in southern California (Ernest et al. 2014; Riley et al. 2014; Vickers et al. 2015), increase local extinction risk in amphibians and reptiles (Cushman 2006; Brehme et al. 2018), cause high levels of avoidance behavior and mortality in birds and insects (Benítez-López et al. 2010; Loss et al. 2014; Kantola et al. 2019), and alter pollinator behavior and degrade habitats (Trombulak and Frissell 2000; Goverde et al. 2002; Aguilar et al. 2008). Habitat fragmentation also severely impacts plant communities. An 18-year study found that reconnected landscapes had nearly 14% more plant species compared to fragmented habitats, and that number is likely to continue to rise as time passes (Damschen et al. 2019). The authors conclude that efforts to preserve and enhance connectivity will pay off over the long-term (Damschen et al. 2019). In addition, connectivity between high quality habitat areas in heterogeneous landscapes is important to allow for range shifts and species migrations as climate changes (Heller and Zavaleta 2009; Cushman et al. 2013; Krosby et al. 2018). Loss of wildlife connectivity decreases biodiversity and degrades ecosystems.

Response 7-9:

The potential for the Project to affect wildlife corridors and habitat linkages is addressed in Section 5.3: Biological Resources in the Draft EIR on pages 5.3-52 to 5.3-54 and pages 5.3-93 to 5.3-96. Please also see *Responses 1-5* through *1-13*, responding to the California Department of Fish and Wildlife. The analysis of the Project's potential impacts on wildlife corridors and habitat linkages considered information from several studies including the South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion and The California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California studies. The Project site is not located within any of the important habitat linkage areas identified in these regional studies and the impact of the Project on wildlife corridors and habitat linkages was determined to be less than significant. The Project will contribute to a significant cumulative impact on mountain lion movement and mitigation for the contribution of the Project to this cumulative impact is identified.

Comment 7-10:

The Draft EIR fails to adequately describe the Project area's importance in wildlife connectivity. Although the Draft EIR acknowledges that the Project site is located adjacent to the Santa Monica-Sierra Madre Connection, the Draft EIR states that impacts would be less than significant. (Draft EIR at 5.3-96). The Draft EIR does not support this conclusion.

Response 7-10:

Please see *Response 7-9*. Please also see *Responses 1-5* through *1-13*, responding to comments from the California Department of Fish and Wildlife on this subject. The Project will contribute to a significant cumulative impact on mountain lion movement and mitigation for the contribution of the Project to this cumulative impact is identified.

Comment 7-11:

The proposed development will increase human activities in open space and further fragment the landscape, which could affect the diverse animals and plants in the area. For instance, field observations and controlled laboratory experiments have shown that traffic noise can significantly degrade habitat value for migrating songbirds (Ware et al. 2015). Subjects exposed to 55 and 61 dBA (simulated traffic noise) exhibited decreased feeding behavior and duration, as well as increased vigilance behavior (Ware et al. 2015). Such behavioral shifts increase the risk of starvation, thus decreasing survival rates. Another study also highlighted the detrimental impacts of siting development near areas protected for wildlife. The study noted that "Anthropogenic noise 3 and 10 dB above natural sound levels . . . has documented effects on wildlife species richness, abundance, reproductive success, behavior, and physiology" (Buxton et al. 2017). The study further noted that "there is evidence of impacts across a wide range of species [] regardless of hearing sensitivity, including direct effects on invertebrates that lack ears and indirect effects on plants and entire ecological communities (*e.g.*, reduced seedling recruitment due to altered behavior

of seed distributors)" (Buxton et al. 2017). Moreover, human transportation networks and development resulted in high noise exceedances in protected areas (Buxton et al. 2017). Additional traffic, construction, and human activities caused by the Project has the potential to interfere with wildlife connectivity. The Draft EIR fails to adequately assess such impacts.

Response 7-11:

Please see *Response 1-7*, responding to the California Department of Fish and Wildlife regarding the Project's potential anthropogenic (i.e., human) impacts on wildlife. The Project site is proposed in the existing community of Val Verde and access to the site would be provided by existing roads. Table 5.11-11 in Section: 5.11 Noise in the Draft EIR presents information on existing noise levels on roadways in the area and the increases in traffic noise that would result from the addition of traffic from the Project. As shown in this table, the areas located along these roadways are already subject to noise from traffic on these roads and the additional traffic from the Project would not result in substantial increases in these noise levels. For example, the noise generated by traffic on Del Valle Road south of Hasley Canyon is currently approximately 58 decibels and would increase by approximately 2 decibels with the addition of traffic from the Project. This analysis supports the conclusion that the Project will not result in substantial increases in roadway noise that would result in significant indirect impacts on wildlife.

Comment 7-12:

In addition, preliminary results from studies underway by researchers at UC Davis and University of Southern California, as well as those by other researchers, suggest that the light, noise, and other aspects of roads can have negative impacts on wildlife numbers and diversity near the roadways (Shilling 2020; Vickers 2020). The researchers found a significant difference between species richness and species type, with lower richness and fewer species at along roadsides compared to background areas 1 km away from the roads (Shilling 2020). They also found that as traffic noises surpassed 60 dBC [SIC], the number of visits by small to large mammals decreased, and most of the species in their study avoid traffic noise (Shilling 2020). It is clear that different species have variable sensitivities to noise and light associated with development and transportation infrastructure; this can lead to changes in species distributions and population health and survival, which can have ecosystem-level impacts (*e.g.*, Suraci et al. 2019). Again, the Draft EIR fails to adequately assess and mitigate impacts of edge effects on functional connectivity.

Response 7-12:

As discussed in *Response 7-11*, the Project site is proposed in the existing community of Val Verde, access to the Project site would be provided by existing roads, and the increases in roadway noise associated with the Project would not result in substantial increases in roadway noise that would result in significant indirect impacts on wildlife.

Comment 7-13:

As the Draft EIR admits, the Project would potentially interfere with wildlife movement and remove access to suitable habitat patches and established nursery sites. (Draft EIR at 5.3-94.) Negative edge effects from human activity, traffic, lighting, noise, pollutants, invasive weeds, and increased fire frequency have been found to be biologically significant up to 300 meters (~1000 feet) away from development in terrestrial systems (Environmental Law Institute 2003). By eliminating available habitat, the Project would diminish local wildlife movement and the long-term viability of the Sierra Madre – Castaic Connection.

The Draft EIR claims impacts will be less than significant because the Sierra Madre – Castaic Connection "provide[s] largely undeveloped intact habitat for wildlife movement corridors and habitat linkages." (Draft EIR at 5.3-94.) This is inaccurate, as the County approved the 1,300-acre Northlake Specific Plan development within this linkage, despite objections from the Center, Santa Monica Mountains Conservancy, and other stakeholders that it would harm the linkage. The County cannot claim this Project does not have significant impacts by pointing to the Sierra Madre – Castaic Connection given that the County has not ensured the protection of that linkage and is approving other projects within the linkage.

Response 7-13:

Please see *Response 1-6*, responding to the California Department of Fish and Wildlife for information on wildlife corridors and linkages in the area and *Response 7-5*, above. As presented in the responses, the Project site is adjacent to existing development with existing residential to the west and south of the Project site, the one million square foot industrial IAC Commerce Center to the east of the Project site, and an active off-road vehicle racetrack directly to the north with the larger community of Castaic and Hasley Canyon community to the north.). From a regional perspective, I-5, located approximately two miles to the east of the Project site, is a major barrier to wildlife movement with additional wildlife connectivity restrictions from the industrial park approximately 0.2 mile to the east of the Project site, residential developments to the north, south, and southwest, and the Chiquita Canyon Landfill, SR-126, and the approved Newhall Ranch Specific Plan project, with the first phase development in the Mission Village portion of Newhall Ranch currently underway, to the south. These existing and approved developments constrain wildlife from moving through the Project site from all directions except the northwest and, for these reasons, the Project site is not located in a wildlife movement corridor or habitat linkage area. From a regional standpoint, the Project site is located over 6.5 miles outside of the Los Padres National Forest/Sespe Wilderness Area.

South of the Project site, Chiquita Canyon was identified by the County of Los Angeles as a possible local movement area through a landfill, which lies south and east of Val Verde, and west of the commercial development that would provide access to the Project site. Although the Project off-site open space dedication area is near this area, the approximately 700- to 1,100-foot (0.2 miles at widest) gap between the residential and commercial developments is above the landfill with steep topography. Additionally, the

existing Val Verde residential neighborhood is along Chiquita Canyon Road and borders the landfill. Reviewing the Dellinger et al. (2019) model, almost this entire area is characterized as poor suitable habitat for mountain lions, except for the habitat near SR-126 and the tops of the hills (**Exhibit 1**). The small open space area between SR-126 and the Project site contains low-quality habitat for mountain lions. In addition, the Riley et al. (2021) long-term study identified a mountain lion territory west of the Project site in the high-quality habitat area. Over the long-term study, no data points indicated that the mountain lion from the nearest established mountain lion territory, nor any other collared mountain lion, ventured onto the Project site (see **Appendix B.1**).

As discussed in this comment, the Draft EIR references the South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion (South Coast Wildlands 2008) study, which identified and prioritized landscape linkages widely considered to be the backbone of a conservation strategy for Southern California. The Project site is located outside the landscape linkages identified in this study. The Sierra Madre–Castaic Connection, located approximately 2.3 miles north of the Project site, connects the Los Padres and Angeles National Forests. The Project would not directly or indirectly impact the Sierra Madre–Castaic Connection or contribute to cumulative impacts to this linkage area from other proposed projects, such as the Northlake Specific Plan project. It should also be noted that the January 11, 2021, Statement of Decision on the lawsuit filed by the Center for Biological Diversity against the County of Los Angeles on the Supplemental EIR prepared by the County on the Northlake Specific Plan project upheld the conclusions in this Supplemental EIR that the Northlake Project will not result in significant impacts to the Sierra Madre–Castaic Connection. In addition to this connection, the Santa Monica–Sierra Madre Connection, approximately 2.5 miles west of the Project site, stretches from the Santa Monica Mountains to the peaks of the Santa Susana Mountains and the Sierra Madres Ranges of the Los Padres National Forest (South Coast Wildlands 2008).

Please refer to *Response 7-5* regarding wildfire impacts. The Project site is not located within any of the important habitat linkage areas identified in these regional studies and the impact of the Project on wildlife corridors, habitat linkages, and effects from human activity, traffic, lighting, noise, pollutants, invasive weeds, and increased fire frequency was determined to be less than significant.

Comment 7-14:

The Project's placement will subject the limited surrounding open space to development edge effects and will likely impact key, wide-ranging predators, such as mountain lions and bobcats (Crooks 2002; Riley et al. 2006; Delaney et al. 2010; Lee et al. 2012; Vickers et al. 2015), as well as smaller species with poor dispersal abilities, such as song birds, small mammals, and herpetofauna (Cushman 2006; Benítez-López et al. 2010; Kociolek et al. 2011). Limiting movement and dispersal can affect species' ability to find food, shelter, mates, and refugia after disturbances like fires or floods. Individuals can die off, populations can become isolated, sensitive species can become locally extinct, and important ecological processes like

plant pollination and nutrient cycling can be lost. In addition, linkages and corridors between major core habitat areas are important to allow for range shifts and species migrations as climate changes. Therefore, it is imperative that thorough analyses are conducted to determine if Project activities will affect species movement. The Draft EIR does not provide sufficient details and analyses to warrant their conclusion that Project impacts on habitat connectivity and wildlife movement would be mitigated to less than significant.

Response 7-14:

Please refer to *Response 7*-5 regarding wildfire impacts to mountain lions.

Additionally, as discussed in the responses to the previous comments in this letter and in *Responses 1-5* through *1-13*, responding to the California Department of Fish and Wildlife, the potential edge effects of the Project have been thoroughly assessed and with incorporation of recommended mitigation measures would be less than significant.

Comment 7-15:

The Draft EIR does not adequately consider the need for corridor redundancy (*i.e.* the availability of alternative pathways for movement) or wider corridors. Wider corridors provide a level of corridor redundancy in that they help to ensure that appropriate habitat is available for numerous species. Corridor redundancy is important because it allows for improved functional connectivity and resilience. Compared to a single or narrow pathway, multiple or wider connections between habitat patches increase the probability of movement across landscapes by a wider variety of species, and they provide more habitat for low-mobility species while still allowing for their dispersal (Mcrae et al., 2012; Olson & Burnett, 2008; Pinto & Keitt, 2008). In addition, corridor redundancy provides resilience to uncertainty, impacts of climate change, and extreme events, like flooding or wildfires, by providing alternate escape routes or refugia for animals seeking safety (Cushman et al., 2013; Mcrae et al., 2008; Mcrae et al., 2012; Olson & Burnett, 2008; Pinto & Keitt, 2008).

Corridor redundancy is critical when considering the impacts of climate change on wildlife movement and habitat connectivity. Climate change is increasing stress on species and ecosystems, causing changes in distribution, phenology, physiology, vital rates, genetics, ecosystem structure and processes, and increasing species extinction risk (Warren et al. 2011). A 2016 analysis found that climate-related local extinctions are already widespread and have occurred in hundreds of species, including almost half of the 976 species surveyed (Wiens 2016). A separate study estimated that nearly half of terrestrial non-flying threatened mammals and nearly one-quarter of threatened birds may have already been negatively impacted by climate change in at least part of their distribution (Pacifici et al. 2017). A 2016 meta-analysis reported that climate change is already impacting 82 percent of key ecological processes that form the foundation of healthy ecosystems and on which humans depend for basic needs (Scheffers et al. 2016). Genes are changing, species' physiology and physical features such as body size are changing, species are moving to try to keep pace with suitable climate space, species are shifting their timing of breeding and migration, and entire ecosystems are under stress (Parmesan and Yohe 2003; Root et al. 2003; Parmesan 2006; Chen et al. 2011; Maclean and Wilson 2011; Warren et al. 2011; Cahill et al. 2012). Therefore,

functional habitat connectivity is critical for many animals and plants to adapt to climate change. Again, the Draft EIR fails to use the best available science and adequately assess and mitigate impacts to wildlife movement and functional connectivity.

Response 7-15:

As discussed in the responses to the previous comments in this letter and in *Responses 1-5* through *1-13*, responding to the California Department of Fish and Wildlife, the Project site is not located in an identified wildlife movement corridor and there are several other regional wildlife corridors in the area, including the Sierra Madre–Castaic Connection and the Santa Monica–Sierra Madre Connection, that provide the type of corridor redundancy discussed in this comment. The Project site is not located within any of the important habitat linkage areas identified in regional studies and the impact of the Project on wildlife corridors and habitat linkages would be less than significant. The Project will contribute to a significant cumulative impact on mountain lion movement and mitigation for the contribution of the Project to this cumulative impact is identified.

Comment 7-16:

B. Mitigation Measures do not minimize impacts to wildlife movement and habitat connectivity to less than significant

The Project has the potential to inhibit wildlife movement, and directly and indirectly impact special-status species like mountain lions. As mentioned previously, local mountain lions are facing an extinction vortex largely driven by lack of connectivity and human-caused mortalities. Encroaching on corridors in the Project area will further isolate local mountain lions and drive them closer to local extinction. The Draft EIR fails to adequately mitigate impacts to wildlife movement and habitat connectivity to less than significant. The Draft EIR offers no mitigation designed to ensure wildlife movement. While the Draft EIR does propose a limited about of conservation of open space, there is no analysis in the Draft EIR about how this will ensure that impacts to wildlife movement are less than significant. The Project should require far greater conservation of open space (e.g., 10 to 1 ratio) and describe how the conservation lands will ensure local wildlife connectivity for sensitive species.

Response 7-16:

As discussed in the responses to the previous comments in this letter *Responses 1-5* through *1-13*, responding to the California Department of Fish and Wildlife, the Project would not result in significant impacts on wildlife movement and, for this reason, no mitigation measures are needed or required. The Project will contribute to a significant cumulative impact on mountain lion movement and mitigation for the contribution of the Project to this cumulative impact is identified.

Comment 7-17:

III. The FEIR fails to adequately disclose, assess, and mitigate impacts to wildfire risk.

The EIR does not adequately disclose the impacts of the Project on wildfire risk. The Project is located in an area designated by CalFire as a Very High Fire Hazard Severity Zone. Such categorization indicates that the area is likely to burn within 30 to 50 years. As noted in the Draft EIR, there have been multiple wildfires on or near the Project area in the last fifty years. (Draft EIR at 5.18-4.)

CEQA requires an EIR to identify and analyze a project's significant environmental impacts, including those impacts caused or exacerbated "by bringing development and people into the area affected." (Pub. Resources Code, §§ 21002, 21002.1, subd. (a); CEQA Guidelines, § 15126.2, subd. (a).) The impacts of development in areas prone to wildfire specifically require consideration: "the EIR should evaluate any potentially significant direct, indirect, or cumulative environmental impacts of locating development in areas susceptible to hazardous conditions (e.g., floodplains, coastlines, *wildfire risk areas*), including both short-term and long-term conditions, as identified in authoritative hazard maps, risk assessments or in land use plans addressing such hazard areas." (CEQA Guidelines, § 15126.2, subd. (a), emphasis added.)

The state has recognized that introduction of low or intermediate density development in the Wildland Urban Interface increases ignition risk. (OPR 2018 Final Statement of Reasons – Update to CEQA Guidelines Checklist]; see also *Clews Land & Livestock, LLC v. City of San Diego* (2017) 19 Cal.App.5th 161, 193 [recognizing potential for significant environment effects when project brings new development to a wildfire prone area]).

As discussed in a 2021 Center Report, "Built to Burn: California's Wildlands Developments are Playing with Fire," policymakers must reckon with California's wildfire history and acknowledge that reckless land-use policies are increasing wildfire risk and putting more people in harm's way (Yap et al., 2021). Since 2015 almost 200 people in the state have been killed in wildfires, more than 50,000 structures have burned down, hundreds of thousands have had to evacuate their homes and endure power outages, and millions have been exposed to unhealthy levels of smoke and air pollution. Meanwhile costs for fire suppression and damages have skyrocketed to more than $23 billion during the 2015-2018 fire seasons (Yap et al., 2021).

Almost all contemporary wildfires in California (95-97%) are caused by humans in the wildland urban interface (Balch et al., 2017; Radeloff et al., 2018; Syphard et al., 2007; Syphard & Keeley, 2020). For example, the 2019 Kincade Fire, 2018 Camp and Woolsey fires, and 2017 Tubbs and Thomas fires were sparked by powerlines or electrical equipment. And although many of the 2020 fires were sparked by a lightning storm, the Apple Fire was caused by sparks from a vehicle, the El Dorado Fire was caused by pyrotechnics at a gender-reveal celebration, the Blue Ridge Fire was likely caused by a house fire, and electrical equipment is suspected to have ignited the Silverado and Zogg fires. Clearly, placing more humans and human infrastructure in high fire-prone areas increase risk of igniting more fires. The Draft EIR fails to accurately disclose the increased wildfire risk caused by the Project and ultimately fails to adequately assess and mitigate such impacts.

Continued development in California's highly fire-prone Mediterranean shrublands and grasslands results in the continual release of large amounts of carbon into the atmosphere by removing significant carbon sinks, increasing wildfire frequency, and degrading habitats and ecosystem function. The past few decades

have seen significant growth near natural areas in California's wildland urban interface (*i.e*., the transition zone between human development and wildlands), including more than one million homes built between 1990 and 2010 (Radeloff et al., 2018). And scientists project that at least 640,000 to 1.2 million new homes will be built in the state's highest wildfire risk areas by 2050 under current land use practices (Mann et al., 2014). In addition, rampant fire suppression and logging since European colonization have led to an increase in wildfire intensity and spread when fires ignite, which leads to compounding carbon release events (Bradley et al., 2016; Hanson, 2020; Morrison, 2019).

Progressively hotter, drier, and windier conditions and more extreme weather events due to climate change are making it easier for wildfires to ignite and spread. The number of days with extreme fire weather conditions in California has doubled since 1980, and further climate change will amplify that trend (Goss et al., 2020). Although wildfires are a natural and necessary process in California's landscapes and much of the state's diverse shrubland communities in its Mediterranean ecosystems are adapted to a high severity infrequent wildfire regime, increases in fire frequency in these systems disrupt the historical fire regimes they have evolved with. This can lead to the establishment of more flammable non-native grasses that increase fire threat over time (Keeley, 2005, 2006; Safford & Van de Water, 2014; Syphard et al., 2009, 2018, 2019). Other disturbance and associated edge effects from roads and development, such as nitrogen deposition from vehicle emissions, can also lead to the establishment of such invasive grasses (Keeley et al., 2011) as well as reduced native biodiversity (Hernández et al., 2016). Thus, continued development in fire-prone wildlands has the potential to perpetuate a feedback loop of increased carbon release and wildfire that fuels climate change while eliminating and degrading California's Mediterranean native ecosystems. Southern California is especially vulnerable with development pressures to extend the wildland urban interface into adjacent high fire-prone shrublands. The Project as proposed could increase the risk of wildfire and contribute to this negative feedback loop.

Keeley and Syphard (2019) discuss a poignant and cautionary example: the 2017 Tubbs Fire and the 1964 Hanly Fire had very similar burned area footprints, yet the Tubbs fire burned over 5500 structures and killed at least 22 people while the 1964 Hanly Fire only burned about 100 structures and no one died. The authors suggest that the increased population and human infrastructure in the area led to an increased chance of human-caused ignitions during an extreme wind event (the Tubbs fire was caused by faulty electrical equipment on private property) and the sprawl development over the decades since 1964 put more people at risk (Keeley & Syphard, 2019). Such an example should be a glaring warning to the County's decisionmakers when development is being proposed in a high fire-prone area where wildfires recently burned, like the proposed Project. Wildfire experts are constantly and unambiguously pointing out the dangers of placing communities in high fire-prone areas, yet the Draft EIR fails to adequately disclose, assess, and mitigate wildfire impacts.

Response 7-17:

Wildfire impacts are evaluated in Section 5.8: Hazards and Hazardous Materials and in Section 5.18: Wildfire, of the Draft EIR. The Draft EIR discloses the potential for the Project to result in impacts associated with wildfire in Section 5.8(2)(c) and Section 5.18(2)(c). Analysis is based on the thresholds of

significance derived from the County of Los Angeles Department of Regional Planning's Initial Study Checklist, which is based in part on Appendix G of the State CEQA Guidelines. The Draft EIR further discloses cumulative impacts associated with wildfire in Section 5.18(2)(d). Analysis of the Project's wildfire impacts is based on substantial evidence from the Fire Behavior Analysis and Report, included as Appendix P to the Draft EIR.

As part of the Fire Behavior Analysis and Report, fire behavior computer models were used to predict the potential intensity of fires that could affect the Project site, flame lengths, rate of spread and fire travel distance (arrival times) from worst-case scenario wildfires in both the extreme (Santa Ana wind) and the predominant (Onshore wind) wind conditions. The modeling included the approved Fuel Modification Plan, as included in Figure 5.18-1 of the Draft EIR. This plan complies with Los Angeles County Fire Department (LACoFD) Fuel Modification Plan requirements and would create a buffer area of 200 feet between open space and structures to provide a defensible space for fire suppression forces, slow the rate of spread, and reduce flame lengths and intensities of fires prior to reaching irrigated areas. All proposed plant species, densities, and spacing would comply with LACoFD requirements.

The Project would be constructed in compliance with applicable CBSC and CFC regulations that would ensure that appropriate measures, including fire prevention and fuel modification features, are provided, so that urban development would not expose Project occupants to increased and uncontrolled wildfire hazards. The Project would be designed and developed in accordance with the County Building Code requirements and has an approved fuel modification plan that meets the criteria for the development area. The Project also would include the construction of a one-million-gallon water tank in the Off-Site Water Tank Area. The water tank would be sized to accommodate the Project and additional fire-fighting capacity in the surrounding Val Verde community, in accordance with Los Angeles County Waterworks District No. 36 requirements.

The Project's development would not contribute to, or exacerbate, wildfire risks. Given the compliance of the Project with all proposed State and County requirements related to land management within a Very High Fire Hazard Severity Zone, including an approved Fuel Modification Plan, the Project would not result in significant wildfire-related impacts on the Project site. Further, implementation of the Project, combined with other projects within the Val Verde/Castaic area, would not result in increased wildfire hazard risks.

Comment 7-18:

Text As discussed in the Center's 2021 Report, impacts of wildfire disproportionately affect low-income and minority communities (Yap et al., 2021). The report states:

Impacts of wildfire disproportionately affect vulnerable communities with less adaptive capacity to respond to and recover from hazards like wildfire. Low- income and minority communities, especially Native American, Black, Latinx and Southeast Asian communities, are the most marginalized groups when wildfires occur (Davies et al., 2018).

Past environmental hazards have shown that those in at-risk populations (*e.g.,* low-income, elderly, disabled, non-English-speaking, homeless) often have limited resources for disaster planning and preparedness (Richards, 2019). Vulnerable groups also have fewer resources to have cars to evacuate, buy fire insurance, implement defensible space around their homes, or rebuild, and they have less access to disaster relief during recovery (Davis, 2018; Fothergill & Peak, 2004; Harnett, 2018; Morris, 2019; Richards, 2019).

In addition, emergency services often miss at-risk individuals when disasters happen because of limited capacity or language constraints (Richards, 2019). For example, evacuation warnings are often not conveyed to disadvantaged communities (Davies et al., 2018). In the aftermath of wildfires and other environmental disasters, news stories have repeatedly documented the lack of multilingual evacuation warnings leaving non-English speakers in danger. (Axelrod, 2017; Banse, 2018; Gerety, 2015; Richards, 2019). Survivors are left without resources to cope with the death of loved ones, physical injuries and emotional trauma from the chaos that wildfires have inflicted on their communities.

Health impacts from wildfires, particularly increased air pollution from fine particulates (PM2.5) in smoke, also disproportionately affect vulnerable populations, including low-income communities, people of color, children, the elderly and people with pre-existing medical conditions (Delfino et al., 2009; Hutchinson et al., 2018; Jones et al., 2020; Künzli et al., 2006; Reid et al., 2016).

Increased PM2.5 levels during wildfire events have been associated with increased respiratory and cardiovascular emergency room visits and hospitalizations, which were disproportionately higher for low socioeconomic status communities and people of color (Hutchinson et al., 2018; Jones et al., 2020; Liu et al., 2017; Reid et al., 2016). Similarly, asthma admissions were found to have increased by 34% due to smoke exposure from the 2003 wildfires in Southern California, with elderly and child age groups being the most affected (Künzli et al., 2006).

Farmworkers, who are majority people of color, often have less access to healthcare due to immigration or economic status. They are more vulnerable to the health impacts of poor air quality due to increased exposure to air pollution as they work. Yet farmworkers often have to continue working while fires burn, and smoke fills the air, or risk not getting paid (Herrera, 2018; Kardas-Nelson et al., 2020; Parshley, 2018).

The Draft EIR fails to discuss how the Project will exacerbate these existing problems.

Response 7-18:

This comment indicates that wildfire disproportionately affect low-income and minority communities. CEQA Guidelines Section 15131, Economic and Social Effects, indicates how economic or social information may be included in an analysis of a project's effects on the environment. Per Section 15131(A), the economic or social effects of a project shall not be treated as significant effects on the environment. While an EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes, the analysis must be on the physical changes. Per Section 15131(B), economic or social effects of a project may be used to determine the significance of physical changes caused by the project, and where an EIR uses economic or social effects to determine that a physical change is significant, the EIR shall explain the reason for determining that the effect is significant. Per Section 15131(C), economic, social, and particularly housing factors shall be considered by public agencies together with technological and environmental factors in deciding whether changes in a project are feasible to reduce or avoid the significant effects on the environment identified in the EIR. Insurance is currently not a topic that is examined under CEQA. The Draft EIR analysis focuses on the physical changes of the Project as it relates to wildfire in Section 5.8: Hazards and Hazardous Materials and in Section 5.18: Wildfire. The Project is designed to comply with Los Angeles County Fire Department's (LACoFD) Fuel Modification Plan requirements and would create a buffer area of 200 feet between open space and structures to provide a defensible space for fire suppression forces, slow the rate of spread, and reduce flame lengths and intensities of fires prior to reaching irrigated areas. The Project would be constructed in compliance with applicable CBSC and CFC regulations that would ensure that appropriate measures are provided, including fire prevention and fuel modification features, so that urban development would not expose Project occupants to increased and uncontrolled wildfire hazards. The Project would be designed and developed in accordance with the County Building Code requirements. The Project would also construct a one-million-gallon water tank in the Off-Site Water Tank Area. The water tank would be sized to accommodate the Project and additional fire-fighting capacity in the surrounding Val Verde community, in accordance with Los Angeles County Waterworks District No. 36 requirements. The Project's development would not contribute incrementally with other projects in the area to create an environment that would exacerbate wildfire risks. Given compliance of all proposed State and County requirements related to land management within a Very High Fire Hazard Severity Zone, including an approved Fuel Modification Plan, the Project would not result in a substantial increase in wildfire risks that could affect existing residents in the area.

Comment 7-19:

Finally, the EIR fails to disclose or analyze the Project's impact on the ability of community members to evacuate in the event of a wildfire. Courts have readily found EIRs invalid under CEQA due to the failure to

describe and analyze the wildfire evacuation risk and to evaluate these questions. (*California Clean Energy Commission v. County of Placer* (Dec. 22, 2015, No. C072680), 2015 Cal. App. Unpub. LEXIS 9360, at *1]). In *California Clean Energy Commission*, the court found an EIR for a resort expansion plan deficient because it said "nothing about the impact of the increased population density created by the Project on emergency evacuations in the event a wildfire does occur, nothing about the effect of such evacuations on access for emergency responders and suggested no mitigation measures to address any such concerns" (*Id*. at *78.). The public—including future residents of the Project, and existing residents nearby who will be relying on existing roads for evacuation—have a right to know the full extent of the Project's impacts on wildfire evacuation. Among other things, the EIR should disclose:

- What are the pre- and post-Project expected evacuation times for residents (both Project residents and nearby affected existing residents) fleeing wildfire in the vicinity of the Project site?
- What will the Level of Service be for emergency egress routes from the Project vicinity in the event a wildfire-driven evacuation becomes necessary?
- What, if any, alternative evacuation routes will be available for residents and nearby community members in the event that Project-generated evacuation traffic makes pre-Project routes impassable?
- What effect will Project-resident evacuation have on the ability and timing for first responders who are responding to wildfire in the vicinity of the Project?

The EIR does not adequately disclose and mitigate the Project's direct and cumulative wildfire-related impacts to the environment, including future residents and existing communities.

Response 7-19:

Wildfire impacts are evaluated in Section 5.8: Hazards and Hazardous Materials and in Section 5.18: Wildfire of the Draft EIR. As part of the Fire Behavior Report, a Fire Access and Egress Route Analysis of the Project site was conducted that considers expected fire behavior—how and when it might impact the community and the access roadways. The Report addresses how a fire might impact the two existing access roadways, Del Valle Road and Chiquito Canyon Road, which provide access to the Project site and the surrounding community. For a fire to impact both access roadways simultaneously, the fire would have to burn in a certain direction and could only originate in the upwind area of both roadways.

Fire behavior computer models were used to predict the potential intensity of fires that could affect the site, flame lengths, rate of spread and fire travel distance (arrival times) from worst-case scenario wildfires in both the extreme (Santa Ana wind) and the predominant (onshore wind) wind conditions. The results of this modeling concluded that even when a single fire event was modeled to impact both roads, the distance between the two roads, the orientation of the winds, and the nature of the vegetation along both roads would likely not result in impacts to both roads at the same time. While a fast-moving fire could travel the distance between the two roads in less than an hour, the speed of the fire would likely push the fire past one road before it reached the other road. This means one of the roads would be available for

evacuation. In most cases, there would likely be two or more hours between a fire impacting one of these roads before impacting the other road.

To minimize impediments to emergency access, all on-site roadways have been designed in compliance with the Fire Code and County standards and requirements. The Project includes a comprehensive circulation plan that provides access to the VTTM site and facilitates vehicular circulation throughout the Project site in accordance with County standards.

County evacuations follow pre-planned procedures to determine the best evacuation plan for different types of emergencies. Law enforcement agencies, highway/street departments, and public and private transportation providers would conduct evacuation operations. Activities would include law enforcement traffic control, barricades, signal control, and intersection monitoring downstream of the evacuation area, all with the objective of avoiding or minimizing potential backups and evacuation delays. The evacuation process would be managed and phased, based on vulnerability, location, or other factors. This would enable traffic surges on major roadways to be minimized over a longer timeframe and to result in traffic levels that flow more efficiently than mass evacuations that include multiple large evacuation areas simultaneously. Section 5.15: Transportation of the Draft EIR includes implementation of MM 5.15-1, which would require the preparation of traffic management plans to ensure emergency vehicle access during all aspects of Project construction. Evacuation routes are generally identified by fire protection and law enforcement personnel, and are determined based on the location and extent of the incident and include as many predesignated transportation routes as possible. Primary evacuation routes within the Val Verde community would be accessed through internal neighborhood roadways, which would intersect with the primary ingress/egress roads that intersect off-site primary and major evacuation routes. The Primary Disaster Routes are I-5 located east of the Project site and SR-126 located south of the Project site.

The Draft EIR adequately discloses and analyzes the Project's impact on the ability of community members to evacuate in the event of a wildfire, and the determination that the Project would have a less-than-significant wildfire impact is based on substantial evidence in the Draft EIR.

Comment 7-20:

IV. Conclusion

Thank you for the opportunity to submit comments on the Sterling Ranch Estates Project. Please include the Center on your notice list for all future updates to the Project and do not hesitate to contact us with any questions at the email listed below.

Response 7-20:

As requested in this comment, the Center for Biological Diversity will be added to the list of parties to be notified of future actions related to the Project.

Scott W. Taylor
Managing Director
Scott.Taylor@IACProperties.com

IAC Properties

November 16, 2021

Mr. Jodie Sackett
Planner
Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012

Re: Sterling Ranch Estates Project
TTM 60257, Case #03-250
SCH Number: 2019080092
Castaic, CA

Dear Mr. Sackett:

Please accept this letter in support of the Sterling Ranch Estates Project.

As the owner and developer of the nearby IAC Commerce Center-Valencia, IAC Properties believes the emerging job growth presently being experienced in the Val Verde and Castaic areas could be directly benefited by a commensurate level of additional housing. As of today, the IAC Commerce Center-Valencia industrial park is home to seven, newly constructed, Class-A industrial buildings that are 100% leased by job-creating companies. An eighth new industrial building, currently under construction, is anticipated to be complete by early 2022.

The Sterling Ranch Estates Project will be well located within the Val Verde and Castaic areas, with easy access by its future residents to existing commercial and retail services. Should any residents of the Sterling Ranch Estates Project be employed by any of the companies at the IAC Commerce Center-Valencia, or the adjacent Valencia Commerce Center to the east, they could avoid getting on the freeways to get to work.

8-1

It is our understanding, that the Sterling Ranch Estates Project has been designed to meet the development guidelines of the Castaic Area Community Standards District (CSD) and One Valley One Vision. IAC Properties has been a longtime supporter of such programs and continues to advocate for economic development and growth of the local community. The project will also provide much needed additional benefits, such as a community park, hiking trails, a small retail center and new, upgraded roads to the Val Verde area.

In light of the above, we ask that you give the Sterling Ranch Estates Project's application every consideration.

Regards,
IAC PROPERTIES

Scott Taylor
Managing Director

1849 Green Bay Road, Suite 410 • Highland Park, IL 60035 • T: 847.748.3170

COMMENT LETTER NO. 8:

Scott Taylor
Managing Director
IAC Properties
1849 Green Bay Road
Suite 410
Highland Park, IL 60035

Comment 8-1:

Please accept this letter in support of the Sterling Ranch Estates Project.

As the owner and developer of the nearby IAC Commerce Center-Valencia, IAC Properties believes the emerging job growth presently being experienced in the Val Verde and Castaic areas could be directly benefited by a commensurate level of additional housing. As of today, the IAC Commerce Center-Valencia industrial park is home to seven, newly constructed, Class-A industrial buildings that are 100% leased by job creating companies. An eighth new industrial building, currently under construction, is anticipated to be complete by early 2022.

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In light of the above, we ask that you give the Sterling Ranch Estates Project's application every consideration.

Response 8-1:

This comment expresses general support for the Project and cites some of the Project's features. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As this comment does not address the information, analysis, or conclusions in the Draft EIR, no further response is necessary.

SCOPE
Santa Clarita Organization for Planning and the Environment
TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY
AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY
POST OFFICE BOX 1182, SANTA CLARITA, CA 91386
www.scope.org

1-9-22

Mr. Jodie Sackett
Los Angeles Dept. of Regional Planning
320 W. Temple St.
Los Angeles, CA 90012

Sent via email to jsackett@planning.lacounty.gov

Re: Sterling Ranch DEIR **VTPM No.** 060257 and associated permits

Dear. Mr. Sackett:

SCOPE is a 34 year old environmental and conservation group located in the Santa Clarita Valley and focusing on the watershed of the Santa Clara River.

This letter is timely submitted on January 10th, which is the first business day after the close of the comment period, which fell on a Sunday.

9-1

The developer of Sterling Ranch proposes to create 222 detached single-family residential lots on 57.9 acres, as well as additional infrastructure and three debris basins in the rural community of Val Verde, increasing its current population by approximately 25%.

9-2

The project is located in a Very High Fire Hazard area with only one two lane road in an out of the community. The housing will be located in close proximity to the existing and proposed expansions of the Chiquita Canyon Landfill, making future residents subject to odors and poor air quality caused by this landfill. Sewer and water supply which were identified by local adjacent community members in 2019 have not been adequately addressed. Although the developer claims to have addressed these issues, a careful reading of the EIR and appendices makes it clear that serious problems affecting both existing and future residents remain. We urge your department to not proceed with this project until these issues are completely addressed.

9-3

Proximity to the Chiquita Canyon Landfill

We oppose placing additional homes near a very large and expanding regional landfill. The community of Val Verde is burdened by air quality and odor problems that impact the quality of life for its current residents. The County should NOT allow housing that subjects additional residents to this burden. Also, this proposal does not comply with the County's sustainability plan and commitment to safeguard future residents from undesirable land uses near their homes. Additionally, it appears to violate the County's general plan policy:

Policy AQ 1.1: Minimize health risks to people from industrial toxic or hazardous air pollutant

9-4

emissions, with an emphasis on local hot spots, such as existing point sources affecting immediate sensitive receptors.

The County is well aware of the Air Quality violations by the landfill and air quality issues already impacting existing residents, including numerous Notices of Violation[1] issued over the last two years and the landfill's failure to abide by the Conditions of Approval as to air monitoring requirements.

- In the event that the County choices to expose new and potentially unaware buyers to this deteriorating environmental situation, the County should require full disclosure of the landfill, odor complaints and any violations against the landfill operator to all potential buyers in the conditions of project approval

9-4

Wildfire and Fire Evacuation

This project is located in a Very High Fire Hazard Zone as identified on the County Fire Hazard Maps. We oppose further building in very high fire hazard zones for the following reasons

According to CalFire, 95% of wildfires are human caused[2]. This project will add more infrastructure and people in a high fire hazard area without adequate, fast and safe evacuation routes. The California Attorney General's office has now entered several motions to intervene into various lawsuits over failure to meet the requirements for wildfire impact disclosures.[3] Further, on April 8th, 2021, Los Angeles Superior Court Judge Michael Beckloff set aside the Tejon Ranch project in part for its failure to address wildfire.

Consideration of Sterling Ranch shows a continued disregard for the growing danger of massive wind driven wildfires in VHFHZs that have become so prevalent in the last few years throughout the state due to climate change. In fact, devastating wildfires have occurred repeatedly in this immediate area and illustrate why we must stop building in these fire-prone zones.

9-5

The existing proposed mitigation measures remain inadequate both for public safety and impacts to public financial resources. It has clearly been shown by the Camp fire that burned through Paradise, CA, killing 85 people[4] and the Dixie fire that totally destroyed the historic town of Greenville that vegetation clearing and home hardening does not stop wind driven fires. But that is all that is proposed for mitigation for this impact. The services section discusses only the fire department's response time for house or other residential fires, but does not discuss the Fire Department's ability to respond to a major wildfire in the area.

The access roads in and out of the project area vary in width throughout the community. In some instances they don't even match up to roads within the project (i.e. Lexington, Rainbow Dr, and Trevylon). Ingress and egress to the project is on a two lane road.

[1] Per AQMD Inspector Larry Israel (information request response): "Since 2018 there have been 31 Notice(s) of Violation served to Chiquita Canyon Landfill (Waste Connections) as follows: 2018 – 1 NOV for failing a Source Test, 2019 – 3 NOVs for Rule 402 – Nuisance , 2020 – 18 NOVs for Rule 402 – Nuisance , 2021 – 9 NOVs for Rule 402 – Nuisance"

[2] PBS News Hour, Sept 17th 2020, charts included by reference https://www.pbs.org/newshour/science/californias-catastrophic-wildfires-in-3-charts

[3] **Attorney General Becerra Seeks to Intervene in Litigation Over Wildfire Risk of San Diego Development Projects, March 17th, 2021, Information and Motion included by reference https://oag.ca.gov/news/press-releases/attorney-general-becerra-seeks-intervene-litigation-over-wildfire-risk-san-diego Attorney General Becerra Files Motion to Intervene in Lawsuit Challenging Development of Wildfire-Prone Area in Lake County https://oag.ca.gov/news/press-releases/attorney-general-becerra-files-motion-intervene-lawsuit-challenging-development, incorporated by reference**

[4] https://www.latimes.com/local/california/la-me-camp-fire-deathtrap-20181230-story.html

This community could already face serious evacuation dangers in the event of a fast moving wildfire. Adding another 222 residences to this dangerous situation would create a situation similar to the Paradise fire where people were unable to get out. 9-5

In fact, **07/21/20 Fire Behavior Analysis and Report**[5] finds the following for at least one fire scenario: "Due to the size and extent of the line of fire vs the point source fire, the fire travel and arrival times are much sooner to the access roadway. The complete length of Del Valle Road is impacted in under 24 minutes and the fire front reaches the Chiquito Canyon Road in 48 minutes. This is the scenario that would require the incident commander(s) or field officer of the fire and law enforcement agencies to decide on how to protect the citizens. Below is a simple decision tree for evacuation vs. protecting people in place. Evacuation is always the preferred option but sometimes, it is not possible. It should be noted that the scenario runs from the time the fire impacts Halsey Canyon Road. This fire would have already been burning and would no doubt be discovered and emergency personnel would be working on the decision below before the fire came to the point of the scenario but **the modeling shows that if the fire reaches this point, evacuation is not a likely choice. If there is not enough time to safely move the population at risk to an uninvolved area, consideration of where to best protect them is the next action on the decision tree.''** 9-6

With box canyons and only one two-way road in and out, residents would be trapped with nowhere to go. This chilling statement clearly shows the danger in which future residents would be placed.

In 2020, the Los Angeles County Board of Supervisors passed resolutions calling for evacuation plans and analysis of the time needed for evacuation. The services section states that the fire department response time for house or other fires, is around 8-12 minutes and how long a wildfire might take to reach the community (as described above). It does ***not*** discuss the Fire Department's ability to respond or the length of time needed to evacuate future residents of this development in addition to the existing community for a major wildfire in the area. Instead, we are presented with a scenario where evacuation may not be possible at all. 9-7

We therefore do not concur with the DEIR finding on Page 5.8-27 that the wildfire threat is less than significant. It must be considered as significant and a finding of over-riding consideration provided showing that the need for this project over-rides the need to protect future and current residents from wildfires. We believe that this constitutes a serious failure to disclose on behalf of the developer and must be corrected before the EIR is certified. 9-8

How many lives will the County put in danger by the approval of this Project? 9-9

- If this project is approved in spite of these issues, a condition requiring road widening of Chiquita Canyon Rd. to improve evacuation should be required.

Hydrology

Flooding in this area in storm events is a well known phenomenon. Local residents have reported flooding and sheet flows across the road and have raised concerns that the intense grading may result in landslides and mudflows. 9-10

The DEIR admits these issues on pdf page 538 "Off-site flooding at the intersection of Del Valle Road and Hasley Canyon Road has been known to occur during certain high-intensity storm events. To a lesser extent, off-site flooding at the intersection of Del Valle Road and Chiquito Canyon Road has been known to occur during significantly higher-intensity storm events."

[5] Sterling Ranch DEIR Appendix P, Page 39-40

Detailed maps disclosing some drainage plan issues, including retention basins that appear to be inadequately sized and piping that may not be sufficient to provide drainage for storm water runoff were attached to our 9-19-19 NOP letter included in this DEIR, but appear not to be addressed in the DEIR. ***This is a DEIR deficiency.*** 9-10

We have attached a detailed analysis of the proposed Drainage Plan with maps and notes as Exhibit 1. While Public Works has approved the Drainage Plan, there still seems to be some errors. Please review and respond to these issues. An adequate drainage plan is imperative for this project. 9-11

Utilities – The adequacy of Water and Sewer infrastructure and supply were identified as major concerns by local residents in 2019[6] 9-12

Water

The DEIR relies on an outdated UWMP (2015), even though the 2020 UWMP was completed well before the release of this DEIR. The newer plan contains modeling for reduced rainfall and drought scenarios not found in the earlier plan. It should be used for reference purposes, not the outdated 2015 Plan.

But even the 2020 Plan did not evaluate the supply reduction caused by this past year's drought, which was the worst on record throughout the state and resulted in record low precipitation and water level drops in the Santa Clarita Valley. It also caused the Dept. of Water Resources to release a first ever notice of 0% allocation of state water supplies to its contractors including the Santa Clarita Valley Water Agency[7]. 9-13

The water section of the EIR states that the project is within the District 36 Water Works Service area, but does not say there is adequate water to serve the project. No evaluation of supply and demand including recent large development approvals such as the Del Valle project is included in the DEIR, instead, only a valley wide evaluation is provided. Since District 36 has only one well in the area, and with imported water currently severely reduced, an evaluation of supplies MUST be provided.

Our NOP comment letter requested a water supply assessment for this project. Not only does the DEIR fail to respond to this issue and fails to do any analysis relevant to the District 36 service area. The appendices **do not** contain a will serve letter or any other correspondence at all from Waterworks District 36 stating that they are able to supply this project or that an evaluation has been conducted. ***This is a DEIR deficiency.***

Sewer

In its Sept 4th comment letter on the NOP for this project, the LA County Sanitation Districts stated: 9-14

> "1. The majority of the project area is located outside the sphere of influence of the District as adopted by the Local Formation Agency (LAFCO). Therefore, until the current sphere of interest for the Santa Clarita Valley Sanitation District has been amended by LAFCO to include this area, the District will be unable to annex this area and provide sewerage service."

We did not see any disclosure of this issue in the DEIR. Please explain how the project proponent will obtain sewer service.

[6] Val Verde housing proposal gets to-do list from planners , SCV Signal, Jim Holt, April 12, 2019 https://signalscv.com/2019/04/val-verde-housing-proposal-gets-to-do-list-from-planners/

[7] News From SCV Water https://santaclaritamagazine.com/2021/12/news-from-scv-water/

Additionally, according to the DEIR, "LACDPW required design capacity of sewer mainlines less than 15-inches are considered full, or 100 percent, when the ratio of the depth of flow over the pipe diameter is equal to 0.5. Design capacity of sewer mainlines greater than 15-inches are considered full, or 100 percent, when the ratio of the depth of flow over the pipe diameter is equal to 0.75. [8]

The DEIR further states on page 5.17.2-12 "As discussed in **Appendix O.2** of this Draft EIR, the Project's sewer flows when combined with other anticipated downstream sewer flows would be 85.4 percent of designed pipeline capacity for sewer mainlines greater than 15-inches."

9-15

While the DEIR goes on the claim there would be no impact to sewer line capacity, this statement clearly contradicts that claim. **There is no letter from the Sanitation District indicating the ability to serve this project.** Instead, there is a letter from the Dept of Health Services indicating that a sewer plan must be accepted before the project can proceed. Appendix O also contains two sewer analyses prepared by the developer's consultants, but no acceptance letter.

Biology

We concur, support, and incorporate by reference all comments and recommendations regarding biological impacts as submitted by the Center for Biological Diversity and the Santa Monica Mountains Conservancy in their comments on the NOP and the DEIR.

9-16

In addition we note that without mitigation this project will interfere with an important wildlife corridor.

This is particularly important due to the recently proposed listing for the Southern Mountain Lion which gives this animal protection while the listing is being considered. Mountain Lions need safe road crossings more than even, a recent a UCLA-led study found.[9] Scientists tracking two local mountain lion populations, one in the Santa Monica Mountains and another in the Santa Anas, and have identified the first reproductive signs of inbreeding among these groups, which are cut off from other cougar populations — and therefore breeding options — by busy freeways. These mountain lions may soon find it much harder to reproduce due to a lack of genetic diversity.

9-17

- **This new information must be considered and mitigated prior to any project approval.**

Hazards as disclosed in the Phase I Environment Report, Appendix H

The following hazards are discussed in the phase one report for this project and disclosed in the DEIR, but no mitigation to address or reduce them is included.

Methane from an abandoned oil well.

9-18

As stated on Page 7 of the Phase I Environmental Investigation:

"Based on information from prior consultants and Mr. Williams, an abandoned oil well is present on the Site. This former oil well was previously a part of the Halsey Canyon Oil Field and was installed to a depth of approximately 3,600 feet in 1920. From records obtained from the Division of Oil, Gas and Geothermal Resources (DOGGR), this abandoned oil well was identified as Fernando Oil Well Company No. 1. This oil well was abandoned in 1923. From Title 26 of the California Building Code, no new

[8] DEIR page 5.17.2-10 (pdf page 843)

[9] (https://newsroom.ucla.edu/releases/local-mountain-lions-show-effects-of-inbreeding

building permits are approved for structures within 300 feet of an abandoned oil well. The most effective means of limiting any future concerns with methane is to conduct a methane survey. This would only be required if development was to occur."

The Environmental Report also recommends "re-abandoning" the well to ensure proper abandonment.

- We therefore ask that a condition of approval requiring re-abandonment of this well and that a methane survey be conducted be added to the mitigation for this project.

9-18

Greenhouse Gases

We are in a climate emergency[10] and MUST begin to reduce greenhouse gases in order to keep global temperatures at a level in which all life forms that we currently know can survive. GHG are increasing heat waves and wildfires, and reducing water supply in California[11] among other local impacts and are causing billions of dollars in damage.[12]

The DEIR recognizes the sources of these impacts, including this project, where it states:
Sources of Greenhouse Gas Emissions
With respect to anthropogenic activities, motor vehicle travel, air travel, consumption of fossil fuels for power generation, industrial processes, heating and cooling, landfills, agriculture, and wildfire are the primary sources of GHG emissions. Additionally, land use decisions and future development projects pursuant to implementation of a general plan can affect the generation of GHG emissions from multiple sectors, resulting in direct or indirect GHG emissions. For example, electricity consumed in the lighting and heating of buildings is an indirect source of GHG emissions because it requires electricity from power plants, which emit GHG directly into the atmosphere. Conversely, tailpipe emissions from the use of vehicles generate direct GHG emissions"[13]

9-19

Building auto oriented urban sprawl projects such as this project causes significant generation of GHG. We must stop fooling ourselves and begin to address the indirect causes of GHG emissions if we are ever to get global warming under control. Unlike the information in the EIR which would have us believe everything will be mitigated by using more efficient construction equipment, the project itself will continue to be a major producer of GHG as long as it is inhabited, through energy use and auto trips for its residents. These impacts must be mitigated.

- Like other housing developments recently approved, the County must, at the very least, condition this project to require roof top solar and electric car plug ins, in addition to other low-impact housing requirements that will reduce energy and water use.

Signage and Notice was not provided in Spanish

A majority of ValVerde, the nearest community to this project, is Spanish-speaking. We objected during the NOP process that posted signs and notices should be provided in Spanish because the community is statistically a majority Hispanic community and a large percentage of the community speaks Spanish at home. No notices or signage where provided in that language. This results in barriers to participation for many of the affected members of the community because they cannot participate in their native language.

9-20

Although the County stated at the scoping hearing that materials were available in Spanish, none of the materials received by our group were translated into Spanish nor did any statement appear in Spanish

[10] https://www.ipcc.ch/2021/08/09/ar6-wg1-20210809-pr/

[11] State of California Department of Justice, Attorney General, Climate Change Impacts in California, https://oag.ca.gov/environment/impact, accessed June 2020.

[12] Billion Dollar Climate Disasters, Jan 8, 2022 https://www.ncdc.noaa.gov/billions/

[13] 5.7-4 **Sterling Ranch Estates Residential Project,** Draft Environmental Impact Report November 2021

offering to answer questions. 9-20

In addition, we were given only seven days notice for the public hearing on the DEIR. This was not a sufficient time to review the recently released EIR or notify other interested parties. For these reasons we urge you to hold a second public hearing on the DEIR. 9-21

Conclusion
We ask that you address the additional items that we have identified for disclosure and, change the Wildfire impact to "significant" and include the bulleted suggested conditions and mitigations to the final document. 9-22

In light of the extreme fire danger to existing and future residents caused by adding additional units to this area without adequate evacuation, we cannot support the approval of this project..

Thank you in advance for your attention to our concerns.

Sincerely,

President
Attachment: Analysis of the proposed Drainage Plan and Maps

SCOPE Comments Sterling Ranch DEIR, VTPM **No.** 060257 8

Attachment

Analysis of the proposed Drainage Plan and Maps

Sterling Storm Drain Feasibiltiy/Hydrology Adequacy

The following storm drain analysis is based on a flow rate of 84cfs. With a slope of .05 and n=0.015 for roughness, a 36 inch diameter pipe will experience near full capacity for a given length of 500 to 1000 feet (Exhibit #1). A headwater was chosen as 5 with inlet control since the storm drain outlet at the infiltration basin #406A will not be submerged. This is a general overview to show that given the hydrology data shown in Exhibit #2 and the analysis shown in Exhibit #5, it is certain that a storm drain with diameter 48" or possibly larger is required. Exhibit #3 shows the storm drain with referenced profile(Exhibit#4). It can be seen that the outlet condition represents several issues;

1) A pipe with a minimum of 36" in diameter creates an obstruction in the road as the pipe is exposed.
2) The slope of the pipe becomes flat in order to make invert at grade of 1193.5. This represents a flow rate problem as capacities of pipes decrease significantly as the slope becomes less which would require an even larger diameter to maintain capacity.
3) The catch basin which feeds the radius is below the required invert and has created a negative flow. The catch basin will not function as intended and will become a source of storm runoff

9-23

Question on hydrology report;

Page 10 of hydrology perf basin-4(Node 406A) identified on the Water Quality Map located in section 6?

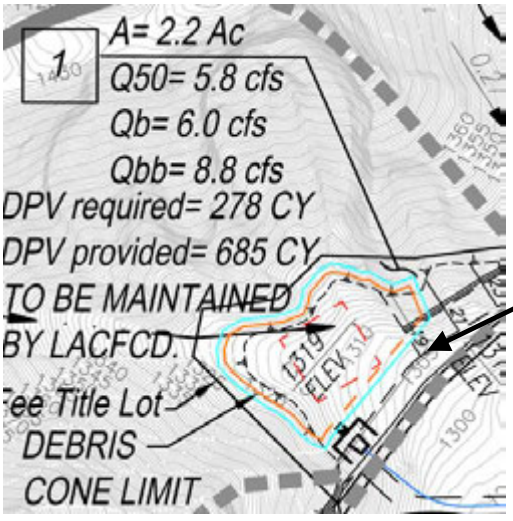
Subarea 406A is not 2 acres, its 0.28 acres. Drawdown of 10.6 hours is calculated based on infiltration of 1.7in/hr. How is the performance due to silt depositing addressed? This drawdown assumes 1.7 in/hr without lose of performance.

9-24

Perc Basin 203A is below historical high ground water of 10' below grade. How is this addressed in drawdown?

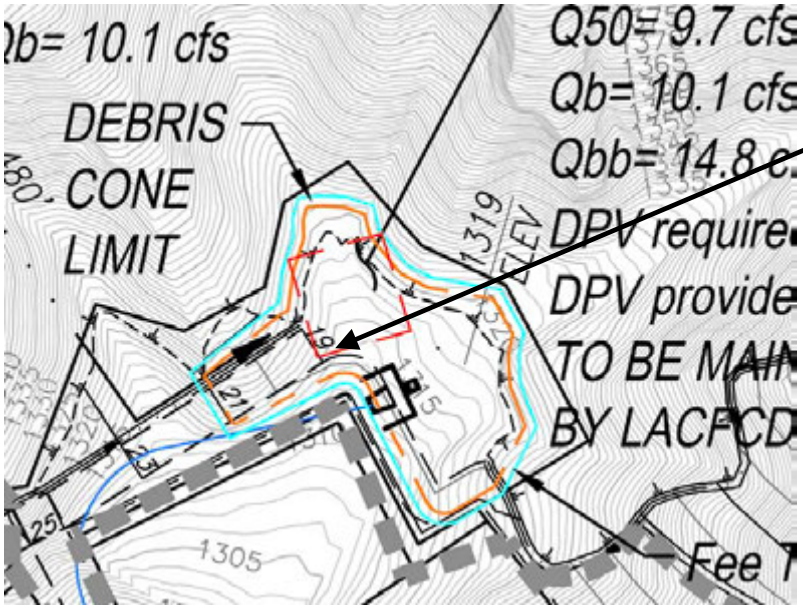
9-25

The following basins are bust in grade and therefore need to be reevaluated in volume:



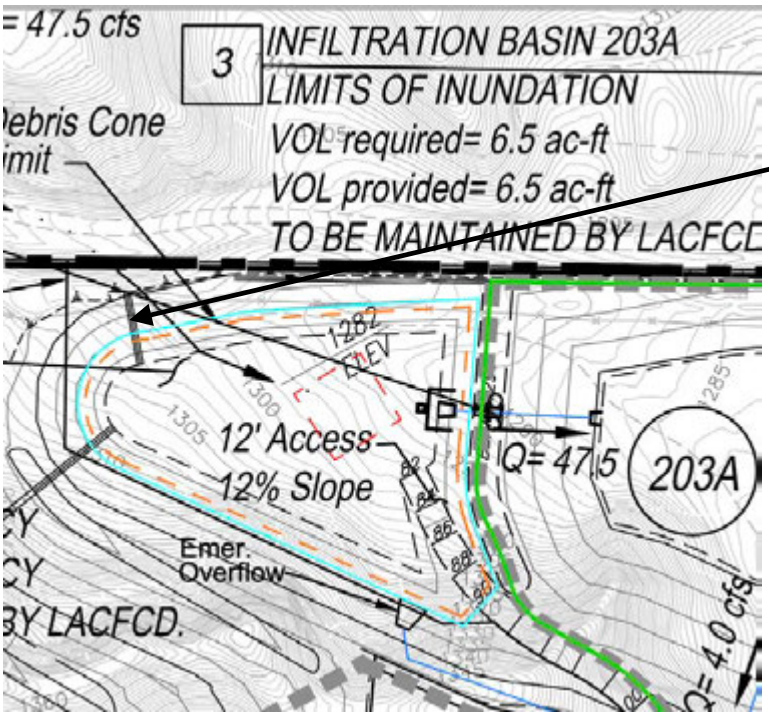
Bottom of access road is at elevation of 19. The bottom of the basin is a 1305 which gives 14 feet of unsupported grade for road. Also no supporting 2:1 slope for road access. Unless fills are vertical?

9-26



Access road to elevation 19 requires fill slope to support. Volume of basin has to be reevaluated based on loss due to fill placement.

9-27

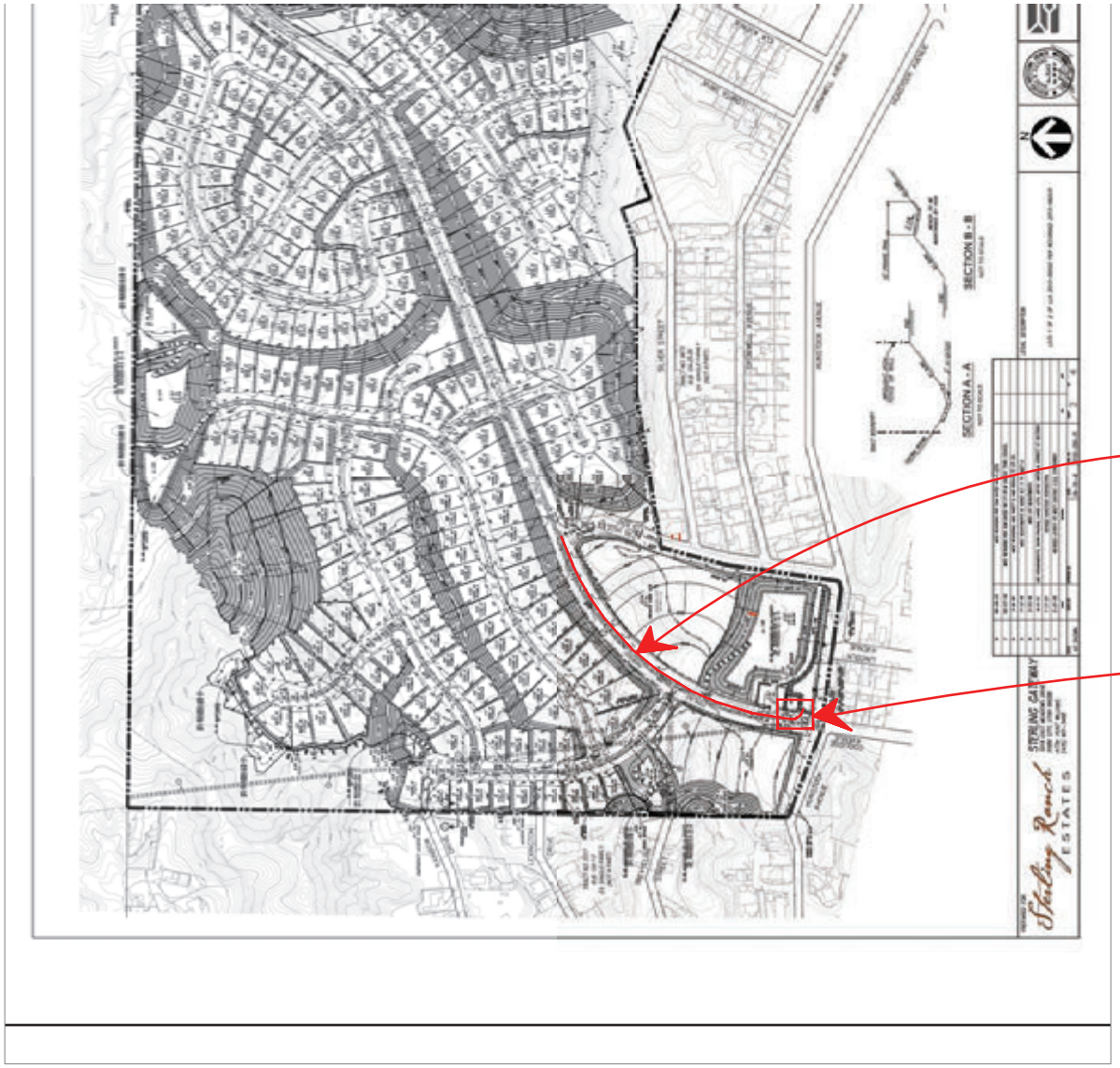


Basin requires 28 feet of cut next to property line. Where is 56 feet of cut slope. Basin requires reevaluation of volume due to grade loss.

9-28

SCOPE Comments Sterling Ranch DEIR, VTPM **No.** 060257 9

Exhibit 1



Reference Map: https/planning.lacounty.gov/assets/upl/case/Tentative Tract Map Grading & Drainage

Storm Drainage Exhibit #1

Storm Drain Pipe Sizing & Analysis

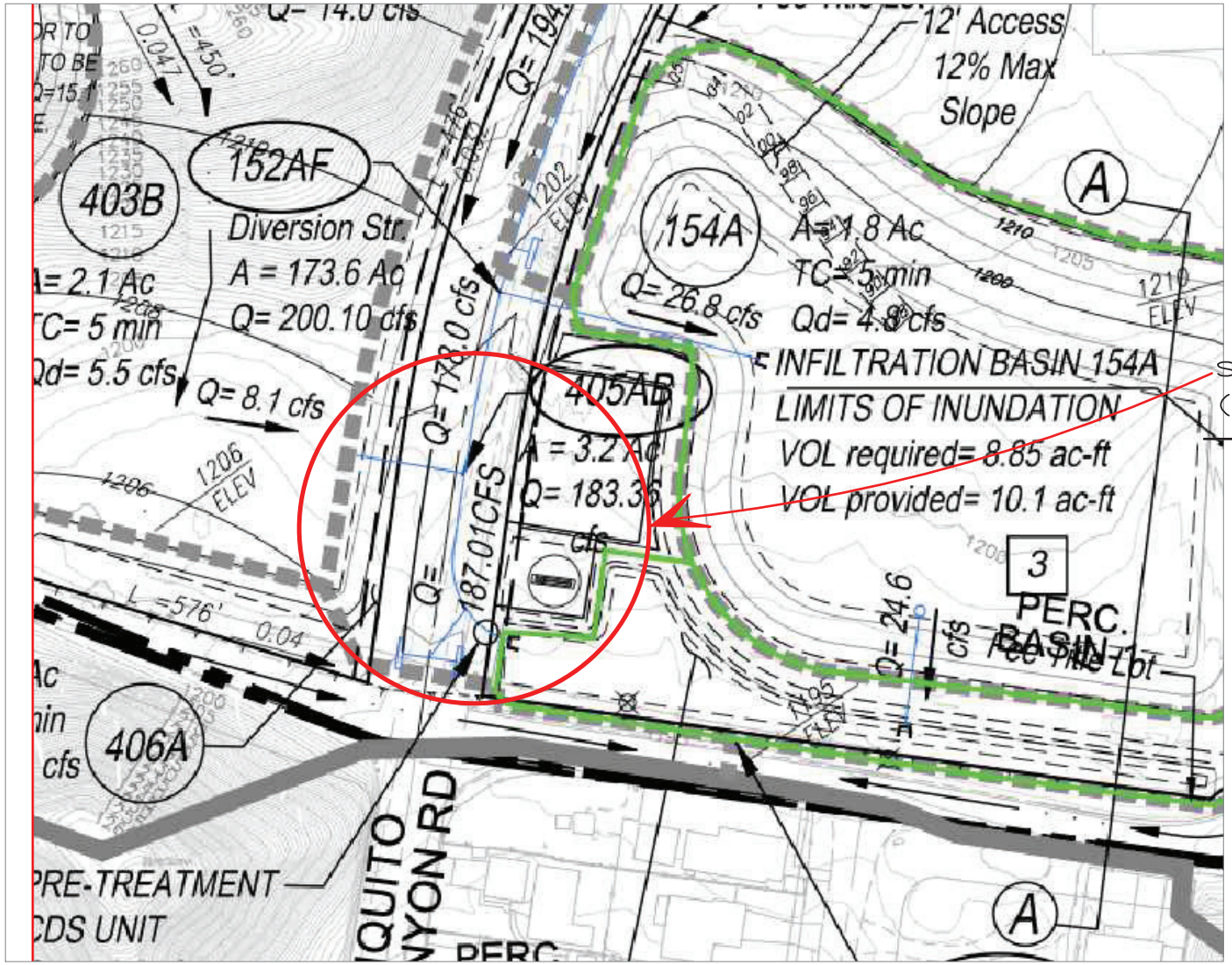
Plan Case No. ESTU2018000137

TR 60257

Date: January 8, 2022

SCOPE Comments Sterling Ranch DEIR, VTPM **No.** 060257 10

Exhibit 2



Storm Drain Stats
(As— shown)

Elevation 1193.5
Q=187.0cfs
S=0.00

Inlet Control

Reference Map: Page 209, County Aprroved Hydrology Study, February 20, 2020, by SIKAND

Storm Drainage Exhibit #2

Storm Drain Pipe Sizing & Analysis

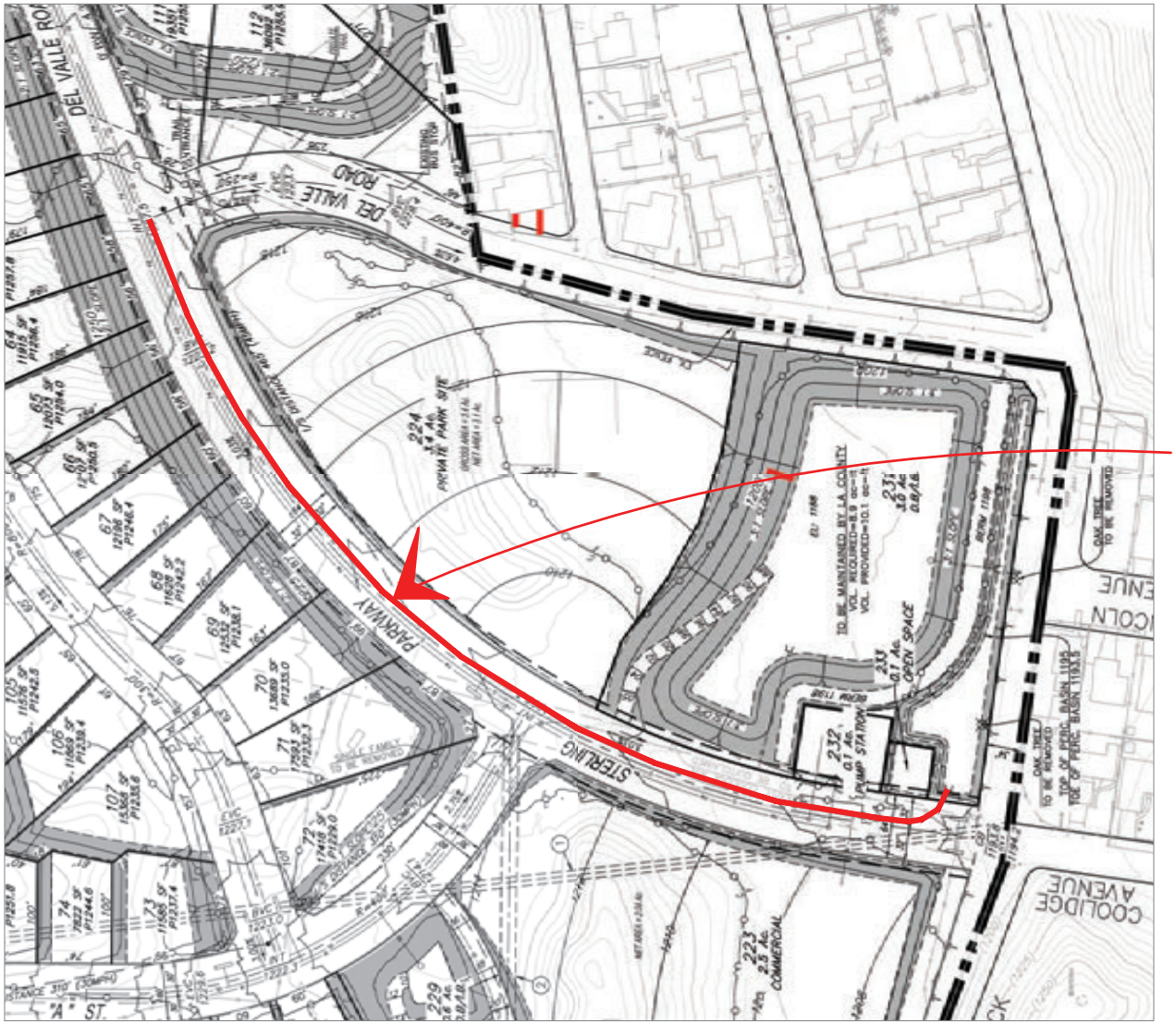
Plan Case No. ESTU2018000137

TR 60257

Date: January 8, 2022

SCOPE Comments Sterling Ranch DEIR, VTPM **No.** 060257 11

Exhibit 3



See SD profile
Exhibit #4

Storm Drain Outlet
Invert Elevation; 1193.5
Q=187cfs
S=0.00
L=2230.5 feet
To Del Valle

Reference Map: https/planning.lacounty.gov/assets/upl/case/Tentative Tract Map Grading & Drainage

Storm Drainage Exhibit #3

Storm Drain Pipe Sizing& Analysis

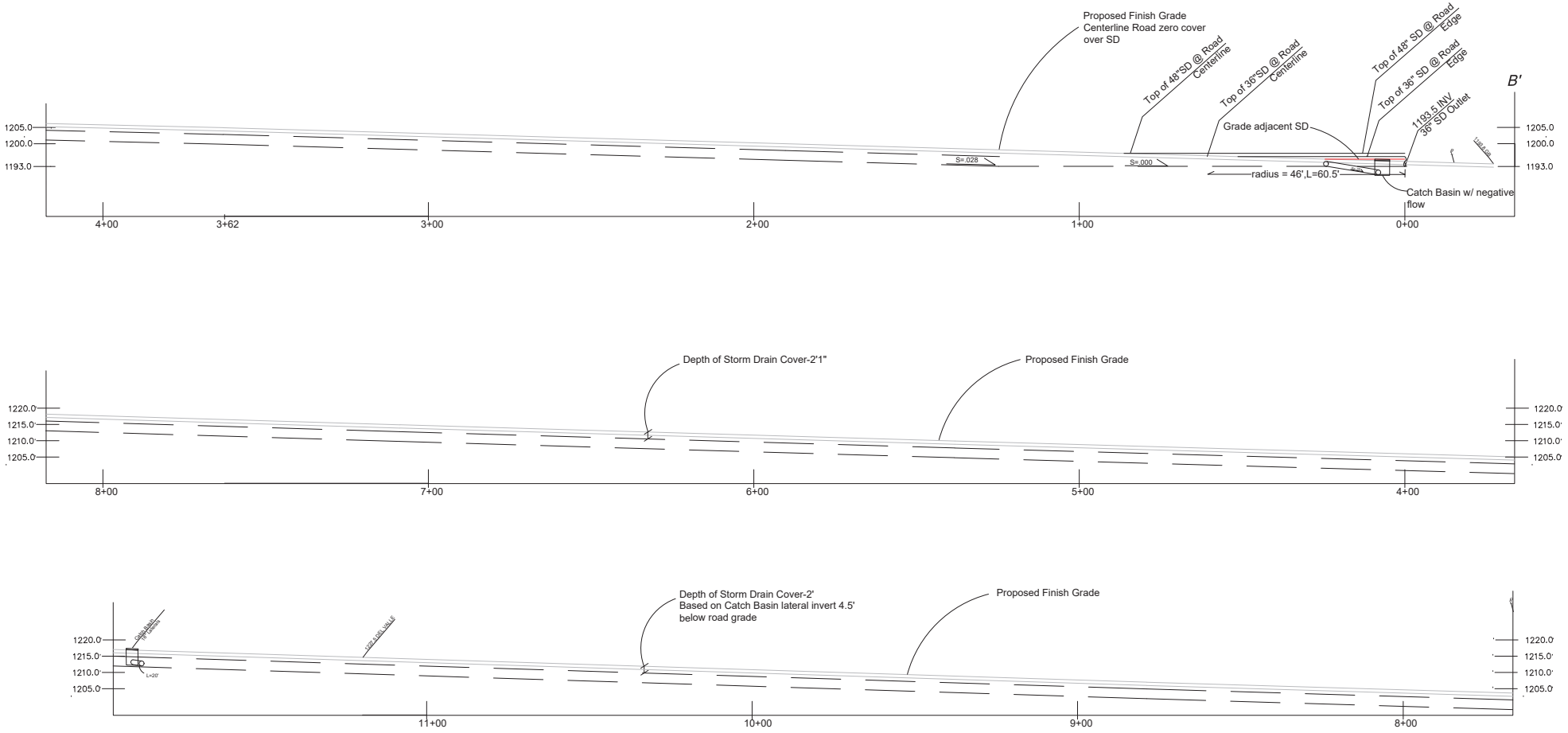
Plan Case No. ESTU2018000137

TR 60257

Date: January 8, 2022

SCOPE Comments Sterling Ranch DEIR, VTPM **No.** 060257 12

Exhibit 4



Reference Map: https/planning.lacounty.gov/assets/upl/case/Tentative Tract Map Grading & Drainage

Storm Drainage Exhibit #4

Storm Drain Profile

Plan Case No. ESTU2018000137

TR 60257

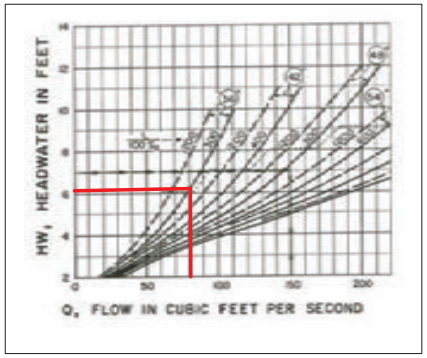
Date: January 8, 2022

SCOPE Comments Sterling Ranch DEIR, VTPM **No.** 060257 13

Exhibit 5

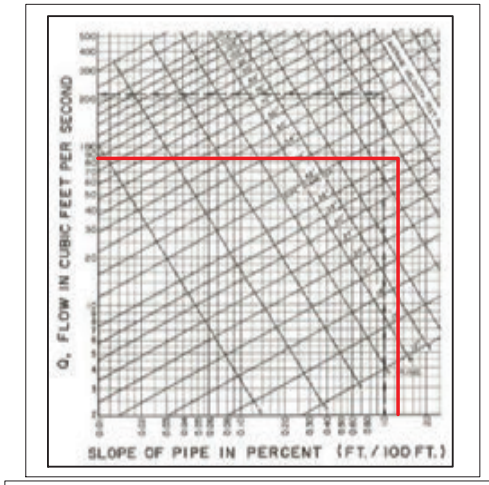
Following equations based on the Rational Method

Headwater Height(7'): L/100So=1009/100*.056=180



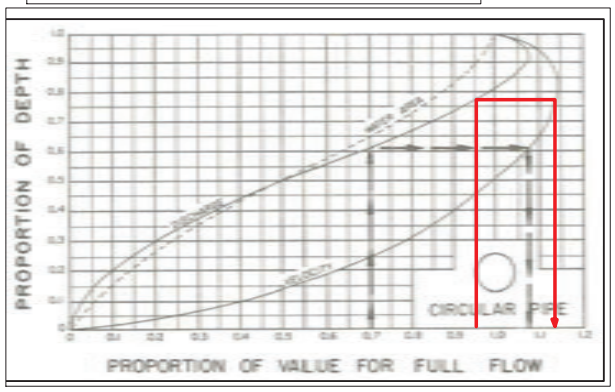
Assume allowable Headwater depth of 7',

Pipe diameter is 36" with inlet controi



n=0056, D=36", Q=85cfs, V=5.5ft/s

81.4/85=.95 Full Flow



Velocity at partial flow

Vp=1.14*5.5=6.3 ft/s

Storm Drainage Exhibit #5
Storm Drain Pipe Sizing & Analysis
Plan Case No. ESTU2018000137
TR 60257
Date: January 8, 2022

https://forterrabp.com/wp-content/uploads/2020/02/hydraulic_design.pdf

COMMENT LETTER NO. 9:

President
Santa Clarita Organization for Planning and the Environment
Post Office Box 1182
Santa Clarita, CA 91386

Comment 9-1:

SCOPE is a 34 year old environmental and conservation group located in the Santa Clarita Valley and focusing on the watershed of the Santa Clara River.

This letter is timely submitted on January 10th, which is the first business day after the close of the comment period, which fell on a Sunday.

Response 9-1:

This comment introduces Santa Clarita Organization for Planning and the Environment (SCOPE) and indicates the date of comment submission. The publication of the Draft EIR marked the beginning of the 60-day public review period, as mandated by CEQA. The Hearing Examiner conducted a virtual (online) public hearing on Tuesday, December 14, 2021, to take testimony on the Draft EIR during the 60-day public review and comment period. This period initially extended from November 11, 2021 to January 9, 2022, and was later extended to January 10, 2022 during the December 14, 2021 Hearing Examiner meeting. As this comment does not address the information, analysis, or conclusions in the Draft EIR, no further response is necessary.

Comment 9-2:

The developer of Sterling Ranch proposes to create 222 detached single-family residential lots on 57.9 acres, as well as additional infrastructure and three debris basins in the rural community of Val Verde, increasing its current population by approximately 25%.

Response 9-2:

As summarized in this comment, the Project would create 222 single-family residential lots on 57.9 acres and would include three debris basin lots on 1.0 acre. Additional infrastructure improvements include a private recreation pocket park on 0.2 acres, a private recreation lot on 3.4 acres, 21,000 sq. ft. of commercial uses on 2.5 acres, seven open space lots on approximately 22.5 acres, six homeowner association (HOA) lots on 0.1 acres, two access road lots on 0.1 acres, two debris/infiltration basin lots on 3.5 acres, and one infiltration basin on 3.0 acres; a pump station on a 0.1-acre lot, and 19.6 acres of public right-of-way (roads) for a total of 113.9 gross acres.

The US Census population for 2018 Val Verde was 2,468 residents. As described in the Draft EIR Section 5.12: Population and Housing, the Project would add approximately 686 residents to Val Verde, which would represent a population increase of approximately 28 percent.

As further described in Section 5.12 of the Draft EIR, population in the San Fernando Valley Council of Governments (SFVCOG) subregion is projected to increase by 30,300 residents between 2020 and 2035, and 11,300 residents between 2035 and 2040. The increase in population associated with the Project would account for approximately 2.3 percent of the forecasted growth in the SFVCOG between 2020 and 2035, and approximately six percent between 2035 and 2040.

Comment 9-3:

The project is located in a Very High Fire Hazard area with only one two lane road in an out of the community. The housing will be located in close proximity to the existing and proposed expansions of the Chiquita Canyon Landfill, making future residents subject to odors and poor air quality caused by this landfill. Sewer and water supply which were identified by local adjacent community members in 2019 have not been adequately addressed. Although the developer claims to have addressed these issues, a careful reading of the EIR and appendices makes it clear that serious problems affecting both existing and future residents remain. We urge your department to not proceed with this project until these issues are completely addressed.

Response 9-3:

Please see *Response 7-19* for a discussion of the analysis of evacuation during a wildfire. The Project site has two existing access roadways—Del Valle Road and Chiquito Canyon Road.

Odors from the Chiquita Canyon Sanitary Landfill are analyzed in Section 5.2: Air Quality, in the Draft EIR, under Threshold 5.2-4. Odors from the landfill have two potential sources associated with landfill operations. One is aerobic decomposition of organic refuse materials prior to being covered with soil, and the other is gases produced by anaerobic bacterial digestion of buried refuse. The landfill implements an odor impact minimization plan that describes the design and operational procedures for minimizing odors. These include operational techniques employed as part of a sanitary landfill operation and the use of the gas collection and flaring system. A gas collection system to reduce odors and prevent gas migration was installed at the landfill in the early 1990s and is used to control methane gas, which is a naturally occurring product of waste decomposition. No significant impacts from landfill odors were identified in the Draft EIR.

As discussed in the Draft EIR, the Final EIR for the expansion of the landfill identified air emissions from landfill operations including fugitive landfill gas emissions, operation of the flare stations and landfill gas-to-energy plant, construction vehicles and waste transfer trucks at refuse fill areas, construction of

additional modules for waste receiving, and closure of modules that have reached capacity.[25] The landfill uses flaring operations to control methane gas emissions and the Project site could be exposed to toxic emissions generated by these operations, which emit minor amounts of toxic air contaminants (TACs), such as benzene, carbon tetrachloride, chloroform, dichlorobenzene, ethylene dichloride, perchloroethylene, and vinyl chloride. In March 2018, SCAQMD finalized and approved the Alternate Rule 1150.1 Compliance Plan for Chiquita Canyon Landfill which requires monthly surface air quality monitoring. Based on the Final EIR for the landfill's expansion, the location of maximum health risk associated with construction and operations for the expansion would be approximately 250 meters, or approximately 820 feet northwest from the facility boundary. The proposed residential uses would be approximately 2,750 feet north of the Chiquita Canyon Landfill. The maximum combined construction and operational impact cancer risk at this location would be 9.3 in one million, less than the SCAQMD acceptable risk level of ten in one million. The chronic and acute noncarcinogenic levels predicted for exposure at the nearest receptor to estimated landfill emissions would be 0.9, below the SCAQMD significance threshold of 1.0 for all receptors. No other sources of toxic air contaminants are located within 0.25 mile of the Project site. The landfill is permitted by the California Environmental Protection Agency (CalEPA), the Regional Water Quality Control Board, Los Angeles Region, the Los Angeles County Department of Public Health, and the SCAQMD. Approval and implementation of this Project would not expose future residents to substantial pollutant concentrations.

Water supply is analyzed in Section 5.17.1: Utilities and Service Systems: Water Supply, in the Draft EIR. Additionally, the Off-Site Improvement Area includes the 2.8-acre Water Tank Area and the 2.4-acre Water Line Improvement Area. The Project would be served by Los Angeles County Waterworks District No. 36, which has determined an upgrade to its off-site facilities would be required to supplement existing capacity to deliver water to the Project site and other portions of District No. 36's service area. As part of the Water Line Improvement Area, the existing water line within Hasley Canyon Road would be upgraded to 16 and 20 inches in diameter to meet the demand of the proposed 222 residential lots within the VTTM site. Approximately 10,600 linear feet would be upgraded along Hasley Canyon Road within approximately 2.4 acres. The proposed uses for the Project would be consistent with the growth projections outlined in the Santa Clarita Valley Area Plan which was used to calculate water demand projections in the Urban Water Management Plan (UWMP). Santa Clarita Valley Water Agency (SCVWA) and District No. 36's existing and planned water supplies would meet demands for a 35-year forecast during normal, dry, and multiple dry periods with surpluses ranging from 19,341 acre-feet per year (AFY) to 50,354 AFY, through

25 County of Los Angeles, Department of Regional Planning, Chiquita Canyon Landfill Master Plan Revision Final Environmental Impact Report (February 2017), Project No. R2004-00559-(5), SCH No. 2005081071, available at https://planning.lacounty.gov/assets/upl/case/project_r2004-00559_final-eir.pdf

2050. An adequate supply of water would be available during Project operation. Impacts on water demand and supply would be less than significant.

The Project would construct infrastructure to connect the Project to the existing sewer system. All single-family lots would be served by separate sewer laterals for each individual lot. Sewer service is analyzed in Section 5.17.2: Utilities and Service Systems: Wastewater, of the Draft EIR. The Sewer Line Improvement Area includes a proposed 4-inch ductile iron pipe sewer force main that would be constructed from the easterly VTTM site boundary within Del Valle Road approximately 3,425 feet to the point of connection with the existing 15-inch sewer line in Hasley Canyon Road to the north. As part of the 0.8-acre Sewer Line Improvement Area, approximately 0.8 acres of existing roadway right-of-way would be disturbed within Del Valle Road during construction of the sewer mainline. Development of these uses would occur in conjunction with the construction of the Project and in accordance with LACDPW guidelines. The Project's sewer flows, when combined with other anticipated downstream sewer flows, would be 85.4 percent of designed pipeline capacity for sewer mainlines greater than 15 inches. Based on the analysis presented in the Sewer Study, no replacement of downstream sewers would be required with implementation of the Project. The Project would increase daily treatment by approximately 0.06 MGD to 18.46 MGD, or approximately 0.6 percent of the remaining 9.7 MGD daily treatment capacity. As such, adequate treatment capacity would be available during Project operation. The current combined capacity of the Santa Clarita Valley Sanitation District (SCVSD) system is 28.1 MGD (31,470 AFY). An adequate treatment capacity would be available during Project operation. A Sewer Area Study was approved by the Los Angeles County Department of Public Works, Land Development Division on April 2, 2020, and is included as Appendix O.2 of the Draft EIR.

Impacts associated with wastewater conveyance and wastewater treatment systems would be less than significant.

Comment 9-4:

Proximity to the Chiquita Canyon Landfill

We oppose placing additional homes near a very large and expanding regional landfill. The community of Val Verde is burdened by air quality and odor problems that impact the quality of life for its current residents. The County should NOT allow housing that subjects additional residents to this burden. Also, this proposal does not comply with the County's sustainability plan and commitment to safeguard future residents from undesirable land uses near their homes. Additionally, it appears to violate the County's general plan policy:

Policy AQ 1.1: Minimize health risks to people from industrial toxic or hazardous air pollutant emissions, with an emphasis on local hot spots, such as existing point sources affecting immediate sensitive receptors.

The County is well aware of the Air Quality violations by the landfill and air quality issues already impacting existing residents, including numerous Notices of Violation[1] issued over the last two years and the landfill's failure to abide by the Conditions of Approval as to air monitoring requirements.

- In the event that the County choices to expose new and potentially unaware buyers to this deteriorating environmental situation, the County should require full disclosure of the landfill, odor complaints and any violations against the landfill operator to all potential buyers in the conditions of project approval.

Response 9-4:

Please see *Response 9-3* for information on the analysis of odors from the Chiquita Canyon Sanitary Landfill in Section 5.2: Air Quality of the Draft EIR. The consistency of the Project with Policy AQ 1.1 is analyzed in Section 5.2 under Threshold 5.2-1 of the Draft EIR. Significant amounts of hazardous substances would typically be associated with industrial, manufacturing, and complex water or wastewater treatment land uses, and not residential or commercial uses. The Project is not anticipated to use hazardous materials in appreciable quantities. All regulated point sources of emissions associated with the Project's commercial uses, should they occur, must be permitted and must use best available control technologies before issuance of a permit.

The Chiquita Canyon Sanitary Landfill uses flaring operations to control methane gas emissions; the Project site could be exposed to the minor amounts of TACs in these emissions. The maximum combined construction and operational impact cancer risk, chronic, and acute noncarcinogenic levels at a residence approximately 820 feet northwest of the landfill and approximately 2,750 feet south of the VTTM site, would fall below the SCAQMD significance thresholds.[26] The landfill is permitted by the CalEPA, the Regional Water Quality Control Board, Los Angeles Region, the Los Angeles County Department of Public Health, and the SCAQMD. Thus, the Project residents would not substantially be exposed to adverse health risks and the Project would be consistent with Los Angeles County General Plan Policy AQ 1.1.

26 County of Los Angeles, Department of Regional Planning, Chiquita Canyon Landfill Master Plan Revision Final Environmental Impact Report, Project No. R2004-00559-(5), SCH No. 2005081071, (February 2017) Air Quality, Pg 11-37, available at https://planning.lacounty.gov/assets/upl/case/project_r2004-00559_final-eir.pdf.

Comment 9-5:

Wildfire and Fire Evacuation

This project is located in a Very High Fire Hazard Zone as identified on the County Fire Hazard Maps. We oppose further building in very high fire hazard zones for the following reasons[.]

According to CalFire, 95% of wildfires are human caused[2]. This project will add more infrastructure and people in a high fire hazard area without adequate, fast, and safe evacuation routes. The California Attorney General's office has now entered several motions to intervene into various lawsuits over failure to meet the requirements for wildfire impact disclosures.[3] Further, on April 8th, 2021, Los Angeles Superior Court Judge Michael Beckloff set aside the Tejon Ranch project in part for its failure to address wildfire.

Consideration of Sterling Ranch shows a continued disregard for the growing danger of massive wind driven wildfires in VHFHZs that have become so prevalent in the last few years throughout the state due to climate change. In fact, devastating wildfires have occurred repeatedly in this immediate area and illustrate why we must stop building in these fire-prone zones.

The existing proposed mitigation measures remain inadequate both for public safety and impacts to public financial resources. It has clearly been shown by the Camp fire that burned through Paradise, CA, killing 85 people[4] and the Dixie fire that totally destroyed the historic town of Greenville that vegetation clearing and home hardening does not stop wind driven fires. But that is all that is proposed for mitigation for this impact. The services section discusses only the fire department's response time for house or other residential fires, but does not discuss the Fire Department's ability to respond to a major wildfire in the area.

The access roads in and out of the project area vary in width throughout the community. In some instances, they don't even match up to roads within the project (i.e. Lexington, Rainbow Dr, and Trevylon). Ingress and egress to the project is on a two lane road.

This community could already face serious evacuation dangers in the event of a fast moving wildfire. Adding another 222 residences to this dangerous situation would create a situation similar to the Paradise fire where people were unable to get out.

Response 9-5:

Wildfire impacts are analyzed in Section 5.8: Hazards and Hazardous Materials and in Section 5.18: Wildfire, of the Draft EIR. Please also see *Response 7-19*.

To minimize impediments to emergency access, all on-site roadways have been designed in compliance with the Fire Code and County standards and requirements. The Project includes a comprehensive circulation plan that provides access to the VTTM site and facilitates vehicular circulation throughout the Project site in accordance with County standards. At the request of the Fire Department, through access would be provided between Lexington Drive and the VTTM site via an approximately 26-foot-wide

roadway. Two linear access lots would be approximately 20 feet in width and would be provided to connect the VTTM site to Trevylon Street and Rainbow Drive to the west for additional emergency access for the VTTM site and surrounding neighborhoods, as shown in Figure 3.0-5 of the Draft EIR.

Comment 9-6:

In fact, **07/21/20 Fire Behavior Analysis and Report**[5] finds the following for at least one fire scenario: "Due to the size and extent of the line of fire vs the point source fire, the fire travel and arrival times are much sooner to the access roadway. The complete length of Del Valle Road is impacted in under 24 minutes and the fire front reaches the Chiquito Canyon Road in 48 minutes. This is the scenario that would require the incident commander(s) or field officer of the fire and law enforcement agencies to decide on how to protect the citizens. Below is a simple decision tree for evacuation vs. protecting people in place. Evacuation is always the preferred option but sometimes, it is not possible. It should be noted that the scenario runs from the time the fire impacts Halsey Canyon Road. This fire would have already been burning and would no doubt be discovered and emergency personnel would be working on the decision below before the fire came to the point of the scenario but the modeling shows that if the fire reaches this point, evacuation is not a likely choice. If there is not enough time to safely move the population at risk to an uninvolved area, consideration of where to best protect them is the next action on the decision tree.''

With box canyons and only one two-way road in and out, residents would be trapped with nowhere to go. This chilling statement clearly shows the danger in which future residents would be placed.

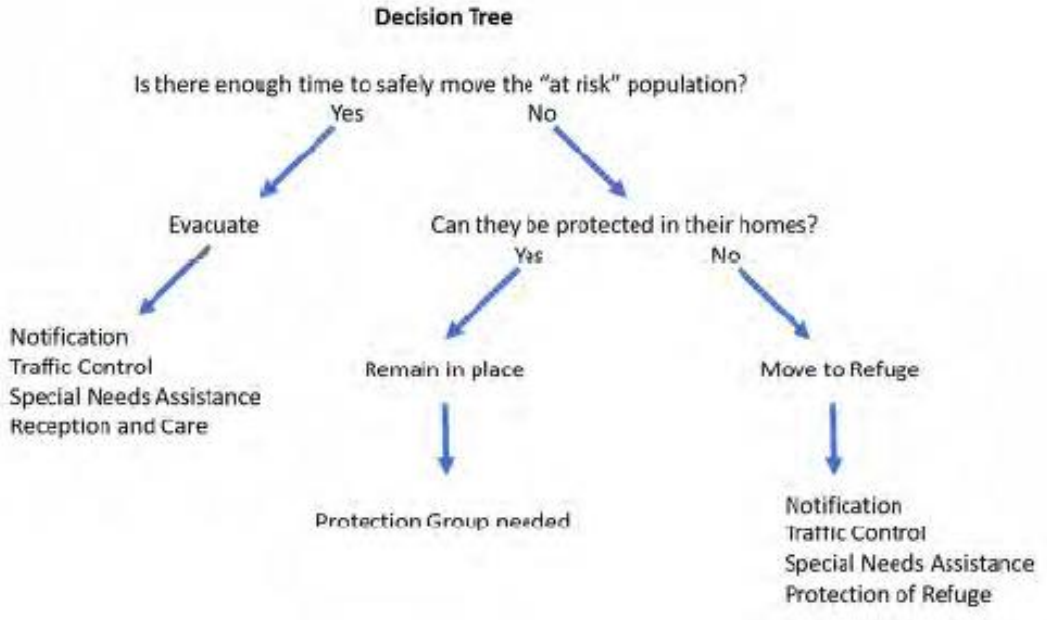
Response 9-6:

As stated in *Response 9-5*, the Fire Behavior Analysis and Report determined, based on fire behavior computer modeling, that for a fire to impact both access roadways simultaneously, the fire would have to burn in a certain direction and could only originate in the upwind area of both roadways. The upwind areas of both roadways include a northeast/southwest travel, north/south travel, and fire from the predominant onshore west wind, as indicated in Figure 30 of Appendix P. Even when a single fire event was modeled to impact both roads, the distance between the two roads, the orientation of the winds, and the nature of the vegetation along both roads, would likely not result in impacts to both roads at the same time. While a fast-moving fire could travel the distance between the two roads in less than an hour, the speed of the fire would likely push the fire past one road before it reached the other road. This means one of the roads would be available for evacuation. In most cases, there would likely be two or more hours between a fire impacting one of these roads before impacting the other road.

The comment quotes a sentence from the Fire Behavior Analysis and Report without the portions of the report before and after this statement that put it into context. The referenced statement is in a portion of the report that discusses one of the potential fire scenarios that was modeled, specifically a line of fire advancing from northeast of the Project site that could impact Del Valle Road in approximately 24 minutes

and Chiquito Canyon Road in 48 minutes. This is the scenario that would require the fire incident commander or field office to decide how to best protect residents in Val Verde. The report states the following:

> *Below is a simple decision tree for evacuation vs. protecting people in place. Evacuation is always the preferred option but sometimes, it is not possible. It should be noted that the scenario runs from the time the fire impacts Halsey Canyon Road. This fire would have already been burning and would no doubt be discovered and emergency personnel would be working on the decision below before the fire came to the point of the scenario but the modeling shows that if the fire reaches this point, evacuation is not a likely choice. If there is not enough time to safely move the population at risk to an uninvolved area, consideration of where to best protect them is the next action on the decision tree.*



The paragraph following this decision tree in the report states the following:

> ***<u>For the project site, a remain in place order is not significant</u>**. Evacuation, if possible, is the safest and best choice but the new community will have fuel modifications zones, Chapter 7A/Section R337 construction features (including radiant heat mitigations, ember resistance and limited use of combustible materials on the exterior of the structures), wide streets, good water supply and defensible space around the structures. Fuels to the north and east of the project site are light to moderate at the edge of the Project Site Only limited fire resources would be needed to protect the project site. Other portions of the Val Verde Community were not built to current codes, do not have wide streets or a robust water supply. For these reasons, the project site would be a good choice for refuge to the existing community if evacuation is not a possible for any reason.*

As stated, the Project has been designed to be fire resistant and for this reason, only limited fire resources would be needed to protect the Project site and residents if, for any reason, residents are not evacuated by the fire incident commander or field supervisor. In fact, as indicated in the report, because of the design characteristics of the Project, including providing defensible space around the homes, adequate water supply for fire-fighting purposes, and wide streets, the Project site would be safer than other nearby portions of Val Verde and would be a good choice for residents from other portions of Val Verde to shelter in place safely during a fire.

Comment 9-7:

In 2020, the Los Angeles County Board of Supervisors passed resolutions calling for evacuation plans and analysis of the time needed for evacuation. The services section states that the fire department response time for house or other fires, is around 8-12 minutes and how long a wildfire might take to reach the community (as described above). It does ***not*** discuss the Fire Department's ability to respond or the length of time needed to evacuate future residents of this development in addition to the existing community for a major wildfire in the area. Instead, we are presented with a scenario where evacuation may not be possible at all.

Response 9-7:

Wildfire impacts are evaluated in Section 5.8: Hazards and Hazardous Materials and in Section 5.18: Wildfire, of the Draft EIR. Section 5.8: Hazards and Hazardous Materials identifies that the Los Angeles County Fire Department (LACoFD) relies on the nationally recognized response time of five minutes for the first arriving unit for fire services. As the Project is located in a suburban area, fire and emergency response times of seven to eight minutes are expected. The LACoFD estimated an emergency response time of 6.5 minutes from Fire Station 143 and just over seven minutes from Fire Station 76 for first responding units. Should a significant incident occur, the resources of the entire LACoFD, not just the stations closest to the Project site, would be used. To minimize impediments to emergency access, all on-site roadways have been designed in compliance with the Fire Code and County standards and requirements. The Project includes a comprehensive circulation plan that provides access to the VTTM site and facilitates vehicular circulation throughout the Project site in accordance with County standards.

As discussed in the previous responses, the Fire Behavior Analysis and Report, included as Appendix P to the Draft EIR, evaluates multiple wildfire scenarios. Fire behavior computer models were used to predict the potential intensity of fires that could affect the site, flame lengths, rate of spread, and fire travel distance (arrival times) from worst-case scenario wildfires in both the extreme (Santa Ana wind) and the predominant (onshore wind) wind conditions. Due to the distance between the two roads, the orientation of the winds, and the nature of the vegetation along both roads, both roads would not be impacted at the same time. While a fast-moving fire could travel the distance between the two roads in less than an hour,

the speed of the fire would likely push the fire past one road before it reached the other road. This means one of the roads would be available for evacuation. In most cases, there would likely be two or more hours between a fire impacting one of these roads before impacting the other road.

Evacuation routes are generally identified by fire protection and law enforcement personnel and are determined based on the location and extent of the incident and include as many predesignated transportation routes as possible. Primary evacuation routes within the Val Verde community would be accessed through internal neighborhood roadways, which would intersect with the primary ingress/egress roads that intersect off-site primary and major evacuation routes. The Primary Disaster Routes are I-5 located east of the Project site and SR-126 located south of the Project site. As part of the Fire Behavior Analysis and Report, included as Appendix P to the Draft EIR, a Fire Access and Egress Route Analysis of the Project site was conducted to analyze the expected fire behavior—how and when it might impact the community and the access roadways. This addresses how a fire might impact the two existing access roadways, Del Valle Road and Chiquito Canyon Road, which provide access to the Project site and the surrounding community. County evacuations follow pre-planned procedures to determine the best evacuation plan for different types of emergencies. Law enforcement agencies, highway/street departments, and public and private transportation providers would conduct evacuation operations. Activities would include law enforcement traffic control, barricades, signal control, and intersection monitoring downstream of the evacuation area, all with the objective of avoiding or minimizing potential backups and evacuation delays. The evacuation process would be managed and phased, based on vulnerability, location, or other factors. This enables traffic surges on major roadways to be minimized over a longer timeframe and to result in traffic levels that flow more efficiently than mass evacuations that include multiple large evacuation areas simultaneously.

With the limited number of existing homes in Val Verde, even with the addition of the new homes in the Project, there would be sufficient time for all residents to be safely evacuated if needed. In addition, there is also adequate space within the existing community and Project site for residents to safely remain until safe passage is available due to the design of the Project and compliance with all State and County requirements related to land management within a Very High Fire Hazard Severity Zone, including an approved Fuel Modification Plan. As other portions of the Val Verde Community are not built to current codes, lacking wide streets or a robust water supply, the Project site would be a good refuge for the existing community if evacuation is not possible for any reason. Thus, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan and impacts would be less than significant. Implementation of the Project combined with other development in this area would not result in increased exposure to wildfire risks. Implementation of the Project would not result in adverse wildfire conditions and wildfire impacts would be less than significant.

Comment 9-8:

We therefore do not concur with the Draft EIR finding on Page 5.8-27 that the wildfire threat is less than significant. It must be considered as significant and a finding of over-riding consideration provided showing that the need for this project over-rides the need to protect future and current residents from wildfires. We believe that this constitutes a serious failure to disclose on behalf of the developer and must be corrected before the EIR is certified.

Response 9-8:

Please see *Responses 9-5* to *9-7*.

Comment 9-9:

How many lives will the County put in danger by the approval of this Project?

- If this project is approved in spite of these issues, a condition requiring road widening of Chiquita Canyon Rd. to improve evacuation should be required.

Response 9-9:

Please see *Responses 9-5* to *9-7*. As part of the Fire Behavior Report, included as Appendix P to the Draft EIR, a Fire Access and Egress Route Analysis of the Project site was conducted to analyze the expected fire behavior and how and when it might impact the community and the access roadways. This analysis determined that adequate capacity is provided by Del Valle Road and Chiquito Canyon Road, and the need to widen Chiquito Canyon Road for evacuation purposes was not necessary.

Section 5.15: Transportation of the Draft EIR identifies MM 5.15-9, which would require improvements to the intersection of Chiquito Canyon Road and SR-126, to provide two southbound (SB) left-turn lanes, three southbound through lanes, one southbound right-turn lane (for 2 SB Left, 3 SB Through and 1 SB Right), two westbound (WB) left-turn lanes, three westbound through lanes, one westbound right-turn lane (for 2 WB Left, 3 WB Through and 1 WB Right), two northbound (NB) left-turn lanes, two northbound through lanes, two northbound right-turn lanes (for 2 NB Left, 2 NB Through and 2 NB Right), two eastbound (EB) left-turn lanes, three eastbound through lanes, one eastbound right-turn lane (for 2 EB Left, 3 EB Through and 1 EB Right), and installation of a traffic signal. These improvements would increase the capacity of this intersection to accommodate daily traffic and traffic associated with evacuation of the area in the event of a wildfire or other emergency.

Comment 9-10:

Hydrology

Flooding in this area in storm events is a well-known phenomenon. Local residents have reported flooding and sheet flows across the road and have raised concerns that the intense grading may result in landslides and mudflows.

The Draft EIR admits these issues on pdf page 538 "Off-site flooding at the intersection of Del Valle Road and Hasley Canyon Road has been known to occur during certain high-intensity storm events. To a lesser extent, off-site flooding at the intersection of Del Valle Road and Chiquito Canyon Road has been known to occur during significantly higher-intensity storm events."

Detailed maps disclosing some drainage plan issues, including retention basins that appear to be inadequately sized and piping that may not be sufficient to provide drainage for storm water runoff were attached to our 9-19-19 NOP letter included in this Draft EIR, but appear not to be addressed in the Draft EIR.

This is a Draft EIR deficiency.

Response 9-10:

Please refer to *Response 6-4* regarding landslides. As discussed, slope stability evaluations indicate the proposed manufactured slopes and natural slopes would conform with the County of Los Angeles factor of safety requirements for both static and pseudo static conditions. These slopes would have a minimal risk of adversely affecting future home sites at the Project site or off-site properties provided the recommendations in the approved geotechnical reports, referenced and summarized in Section 5.6: Geology and Soils, in the Draft EIR, are incorporated in the Project's plans and implemented during construction.

Additionally, as discussed in Section: Section 5.6: Geology and Soils, of the Draft EIR, the pipelines within the Off-Site Water Line Improvement Area and the Off-Site Sewer Line Improvement Area would be covered and surrounded by certified base and fill. The design and construction of the proposed pipelines would be required to adhere to the Greenbook and CBSC regulations, which contain provisions for soil preparation to minimize potential impacts from landslides. Thus, potential landslide impacts would be less than significant.

As discussed in Section 5.9: Hydrology and Water Quality of the Draft EIR, existing conditions indicate that off-site flooding at the intersection of Del Valle Road and Hasley Canyon Road has been known to occur during certain high-intensity storm events. To a lesser extent, off-site flooding at the intersection of Del Valle Road and Chiquito Canyon Road has been known to occur during significantly higher-intensity storm events. However, the Project would conform with the County Flood Control Act as well as the Santa Clara River and Major Tributaries Drainage Policy.

The Project would comply with applicable County grading permit regulations and requirements of the Statewide general construction stormwater permit, and the Project construction activities would not substantially alter the existing drainage patterns of the site or area in a manner that would result in substantial erosion, or in on- or off-site flooding. Site grading during construction activities would be to

the standards set forth by the LACDPW, and all slopes would be graded, compacted, and stabilized such that they would not be subject to mudflow hazard. Best management practices (BMPs) would keep all runoff water on site during construction and would not exceed the existing storm drainage system. Construction phase BMPs are intended to minimize the effect of all construction activities and equipment on stormwater runoff, including on- and off-site flooding.

Operation of the Project would not substantially alter the existing drainage patterns of the Project site or area such that substantial erosion or siltation would occur in a manner that would result in on- or off-site flooding. The Project's Low Impact Development (LID) components would increase the time of concentration for runoff leaving the VTTM and Off-Site Roadway Improvement Area, which would result in a reduction of peak flows leaving the VTTM and Off-Site Roadway Improvement Area and would result in a decrease in flows traveling off site and decrease the impact on the County's off-site storm drains, including localized flooding during larger rain storm events south of the VTTM site, as shown in Table 5.9-4 of the Draft EIR.

As discussed in Existing Conditions, surface water runoff from the VTTM site and Off-Site Roadway Improvement Area would enter the San Martinez Road drain, then the San Martinez-Chiquito Canyon channel and ultimately the Santa Clara River. The decreased off-site flows when compared to existing flows would not reduce the existing design capacities of the County's off-site San Martinez Road drain nor the San Martinez-Chiquito Canyon channel, especially during localized flooding during larger storm events south of the VTTM site. The decreased off-site flows would not reduce the design capacities of the County's off-site storm drains, especially during localized flooding during larger storm events south of the VTTM site. As previously discussed, off-site flooding currently occurs at the intersection of Del Valle Road and Hasley Canyon Road and at Del Valle Road and Chiquito Canyon Road during high-intensity storm events. As discussed above, the Project would not cause or exacerbate the existing off-site flooding conditions at Del Valle Road and Hasley Canyon Road or at Del Valle Road and Chiquito Canyon Road.

The design of the Project's drainage infrastructure would reduce runoff that would enter existing or planned drainage systems and would not exceed existing capacity, directly require construction of new stormwater drainage facilities or the expansion of existing facilities, substantially reduce or increase the amount of surface water in a water body, or result in a permanent adverse change to the movement of surface water. Project impacts associated with flooding on- or off-site during operation of the VTTM site, Off-Site Water Tank Area, Off-Site Roadway Improvement Area, and Off-Site Water Line and Sewer Line Areas would be less than significant.

The Project would include a series of infiltration basins to reduce the peak flow and run-off volume for the VTTM site below existing conditions. The stormwater quality control measures chosen to provide

infiltration for the Project include three debris basins, two debris/infiltration basins, and a single infiltration basin before entering the proposed storm drain system, identified in Figure 5.9-2 of the Draft EIR. The VTTM stormwater quality control measures have been incorporated into the site design to provide the required infiltration for the LID storm event.

A Sewer Area Study was approved by the Los Angeles County Department of Public Works, Land Development Division, on April 2, 2020, and is included as Appendix O.2 of the Draft EIR.

Comment 9-11:

We have attached a detailed analysis of the proposed Drainage Plan with maps and notes as Exhibit 1. While Public Works has approved the Drainage Plan, there still seems to be some errors. Please review and respond to these issues. An adequate drainage plan is imperative for this project.

Response 9-11:

The changes to hydrology and drainage conditions that would result from the Project are analyzed in Section 5.9: Hydrology and Water Quality in the Draft EIR. The Draft EIR concluded the Project would not result in any significant impacts related to flooding on- or off-site. The Project would not increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site and would not impede or redirect flood flows. There are no "errors" in the hydrology analysis and the Project will not result in any significant hydrology or drainage impacts as discussed in the responses to the specific comments that follow.

Comment 9-12:

Utilities – The adequacy of Water and Sewer infrastructure and supply were identified as major concerns by local residents in 2019.

Response 9-12:

Please refer to *Response 9-3* regarding water supply and infrastructure. Water supply is analyzed in Section 5.17.1: Utilities and Service Systems: Water Supply, in the Draft EIR. An adequate supply of water would be available during Project operation. The Project impact on water demand and supply would be less than significant.

Please refer to *Response 9-3* regarding sewer supply and infrastructure. Section 5.17.2: Utilities and Service Systems: Wastewater, of the Draft EIR, analyzes sewer services. An adequate treatment capacity would be available during Project operation. A Sewer Area Study was approved by the Los Angeles County Department of Public Works, Land Development Division, on April 2, 2020, and is included as Appendix O.2 of the Draft EIR. Impacts associated with wastewater conveyance and wastewater treatment systems would be less than significant.

Comment 9-13:

Water

The Draft EIR relies on an outdated UWMP (2015), even though the 2020 UWMP was completed well before the release of this Draft EIR. The newer plan contains modeling for reduced rainfall and drought scenarios not found in the earlier plan. It should be used for reference purposes, not the outdated 2015 Plan.

But even the 2020 Plan did not evaluate the supply reduction caused by this past year's drought, which was the worst on record throughout the state and resulted in record low precipitation and water level drops in the Santa Clarita Valley. It also caused the Dept. of Water Resources to release a first ever notice of 0% allocation of state water supplies to its contractors including the Santa Clarita Valley Water Agency

The water section of the EIR states that the project is within the District 36 Water Works Service area but does not say there is adequate water to serve the project. No evaluation of supply and demand including recent large development approvals such as the Del Valle project is included in the Draft EIR, instead, only a valley wide evaluation is provided. Since District 36 has only one well in the area, and with imported water currently severely reduced, an evaluation of supplies MUST be provided.

Our NOP comment letter requested a water supply assessment for this project. Not only does the Draft EIR fail to respond to this issue but also fails to do any analysis relevant to the District 36 service area. The appendices **do not** contain a will serve letter or any other correspondence at all from Waterworks District 36 stating that they are able to supply this project or that an evaluation has been conducted. ***This is a Draft EIR deficiency.***

Response 9-13:

Water supply is analyzed in Section 5.17.1: Utilities and Service Systems: Water Supply, of the Draft EIR. The Project includes a Water Service Availability letter sent from the Los Angeles County Department of Public Works on December 16, 2020. The letter was issued in response to the local planning agency as part of the agency review process for the Project.

In the 2015 UWMP, the 2015 population estimate for the Castaic Lake Water Agency (CLWA) was 272,500. Future population projections were based on the land use dwelling unit projections using 2016 buildout estimates and the people per household (PPH) estimates. These projections, provided in Table 2-13 of the Draft EIR, project an average annual growth rate of approximately 1.3 percent per year with the projected population for the Total CLWA Service Area in 2050 projected at 421,400. This population projection was compared to the population projection in the One Valley One Vision (OVOV) joint planning effort by the City of Santa Clarita and Los Angeles County for the entire Santa Clarita Valley, including Canyon Country, Newhall, Saugus, and Valencia, and the County communities of Stevenson Ranch, Castaic, Val Verde, Agua Dulce, and the future Newhall Ranch. Both the One Valley, One Vision (OVOV) area and the Santa Clarita

Valley planning area (defined by SCAG) are slightly larger than the CLWA service area. The 2050 Total CLWA Service Area population projection in the 2015 UWMP of 421,400 people is consistent with the OVOC 2050 population projection for the larger area of 460,000 - 482,000 people.

Water supply in the 2015 UWMP is broken down into existing and planned water supply sources, including wholesale (imported) water, and local supplies. The Draft EIR includes analysis of water supply based on normal year, single-dry year, three-year dry year, and four-year dry year supplies and demand. The demand projections are primarily based on current land use and future development within the Santa Clarita Valley Water Agency (SCVWA) service area.

As indicated in Table 5.17.1-1: Projected Average/Normal Year Supplies and Demands of the Draft EIR, total 2050 supplies would be 122,536 acre-feet (AF) and total 2050 demand would be 93,900 AF. As indicated in Table 5.17.1-2: Projected Single-Dry Year Supplies and Demands of the Draft EIR, which analyzed the event of a single-dry year, similar to the drought that occurred in California in 1977, total 2050 supplies would be 122,641 AF and total 2050 demand would be 103,300 AF. As indicated in Table 5.17-3: Projected Three-Year Dry Year Supplies and Demands of the Draft EIR, which analyzed in the event that a three-year dry period, similar to the drought that occurred during 1990 to 1992, total 2050 supplies would be 130,371 AF and total 2050 demand would be 103,300 AF. As indicated in Table 5.17-4: Projected Four-Year Dry Year Supplies and Demands of the Draft EIR, which analyzed in the event that a four-year dry period, similar to the drought that occurred during 1931 to 1934, total 2050 supplies would be 143,231 AF and total 2050 demand would be 103,300 AF.

The proposed uses for the Project would be consistent with the growth projections outlined in the Santa Clarita Valley Area Plan which was used to calculate water demand projections in the 2015 UWMP. SCVWA and District No. 36's existing and planned water supplies would meet demands for a 35-year forecast during normal, dry, and multiple dry periods with surpluses ranging from 19,341 AFY to 50,354 AFY. An adequate supply of water would be available during Project operation. Contrary to the statement in this comment, the Draft EIR states on page 5.17-18 that "an adequate supply of water would be available during Project operation." Impacts on water demand and supply would be less than significant.

Based on a comparison of the 2015 UWMP and 2020 UWMP, there is no significant difference between the ratio of projected water supplies and water demands, and the conclusion in the Draft EIR that adequate water supplies are available to serve the Project is not affected by the information in the 2020 SCVWA UWMP. The water demand projections in the 2020 UWMP are based on applicable population projections and county and city land use plans, and account for conservation as well as climate change impacts and other relevant factors. The population projections in the 2020 UWMP are slightly lower than the projections in the 2015 WMP as shown below:

	2015 UWMP	2020 UWMP	Difference
2020	289,192	289,100	-92
2025	332,100	321,900	-10,200
2030	362,100	354,600	-7,500
2035	392,500	383,500	-9,000
2040	411,900	396,100	-15,800
2045	422,100	408,800	-13,300
2050	432,200	421,400	-10,800

The conclusion in the 2020 UWMP is that the total projected water supplies available to the SCVWA water service area over the 30-year projection during normal, single-dry, and multiple-dry year (5-year drought) periods are sufficient to meet the total projected water demands throughout the Valley (see Section 7 of the SCVWA 2020 UWMP); provided that SCVWA continues to utilize available water from the State Water Project, and continues to incorporate conjunctive use (coordinated use of surface water and groundwater), water conservation, water transfers, recycled water, and water banking as part of the total water supply portfolio and management approach to long-term water supply planning and strategy.

The Project has been included in the SCAG regional growth forecast for the County of Los Angeles, as such, the Project is included in the projections of population and projected water supplies and demands. There would be no change to impacts as determined by analysis in Section 5.17.1: Utilities and Service Systems: Water Supply of the Draft EIR based on the 2020 UWMP. Therefore, the Project impact on water supply would be less than significant.

The Project does not meet the definition of a Water Demand Project under Section 15155(a)(1)(A) of the CEQA Guidelines. As required by this section a Water Supply Assessment (WSA) is only required for a residential project that includes 500 homes. As the Project would have less than 500 homes, a water supply analysis is not required.

Los Angeles County does not issue “will serve” letters until agreements and plans are completed. This is typically a requirement of Final Map clearances. The Project includes a Water Service Availability letter sent from the Los Angeles County Department of Public Works on December 16, 2020. The letter was issued in response to the local planning agency as part of the agency review process for the Project.

Comment 9-14:

Sewer

In its Sept 4th comment letter on the NOP for this project, the LA County Sanitation Districts stated:

> "1. The majority of the project area is located outside the sphere of influence of the District as adopted by the Local Formation Agency (LAFCO). Therefore, until the current sphere of interest for the Santa Clarita Valley Sanitation District has been amended by LAFCO to include this area, the District will be unable to annex this area and provide sewerage service."

We did not see any disclosure of this issue in the Draft EIR. Please explain how the project proponent will obtain sewer service.

Response 9-14:

Please see the *Responses to Comment Letter 3* from the Local Agency Formation Commission for the County of Los Angeles (LAFCO). Annexation to the Santa Clarita Valley Sanitation District of Los Angeles County is required by the Project. Section 3.0-6: Project Description, Intended Uses of the EIR, has been revised to include this annexation as a discretionary approval action required by the Project. Section 5.17.2: Utilities and Service Systems: Wastewater, in the EIR also has been revised to identify that annexation to the Santa Clarita Valley Sanitation District of Los Angeles County is required by the Project. These revisions are contained in **Section 2.0: Corrections, Clarifications, and Additions to the Draft EIR**, of this Final EIR.

Comment 9-15:

Additionally, according to the Draft EIR, "LACDPW required design capacity of sewer mainlines less than 15-inches are considered full, or 100 percent, when the ratio of the depth of flow over the pipe diameter is equal to 0.5. Design capacity of sewer mainlines greater than 15-inches are considered full, or 100 percent, when the ratio of the depth of flow over the pipe diameter is equal to 0.75.[8]

The Draft EIR further states on page 5.17.2-12 "As discussed in **Appendix O.2** of this Draft EIR, the Project's sewer flows when combined with other anticipated downstream sewer flows would be 85.4 percent of designed pipeline capacity for sewer mainlines greater than 15-inches."

While the Draft EIR goes on the claim there would be no impact to sewer line capacity, this statement clearly contradicts that claim. **There is no letter from the Sanitation District indicating the ability to serve this project.** Instead, there is a letter from the Dept of Health Services indicating that a sewer plan must be accepted before the project can proceed. Appendix O also contains two sewer analyses prepared by the developer's consultants, but no acceptance letter.

Response 9-15:

The Project's impacts on wastewater are analyzed in Section 5.17.2: Utilities and Service Systems: Wastewater. The referenced 85.4 percent is relative to pipe capacity which means 85.4 percent of 3/4 full or 64% of full pipe capacity. Adequate capacity is, therefore, available to accommodate wastewater

generated by the Project. Impacts associated with wastewater conveyance and wastewater treatment systems would be less than significant.

Comment 9-16:

Biology

We concur, support, and incorporate by reference all comments and recommendations regarding biological impacts as submitted by the Center for Biological Diversity and the Santa Monica Mountains Conservancy in their comments on the NOP and the Draft EIR.

Response 9-16:

Please see the responses to the comments from the Center for Biological Diversity (*Letter No. 7*) and the Santa Monica Mountains Conservancy (*Letter No. 6*) in this section of the Final EIR.

Comment 9-17:

In addition, we note that without mitigation this project will interfere with an important wildlife corridor. This is particularly important due to the recently proposed listing for the Southern Mountain Lion which gives this animal protection while the listing is being considered. Mountain Lions need safe road crossings more than even, a recent a UCLA-led study found. Scientists tracking two local mountain lion populations, one in the Santa Monica Mountains and another in the Santa Anas, and have identified the first reproductive signs of inbreeding among these groups, which are cut off from other cougar populations — and therefore breeding options — by busy freeways. These mountain lions may soon find it much harder to reproduce due to a lack of genetic diversity.

- **This new information must be considered and mitigated prior to any project approval.**

Response 9-17:

Please see the responses to the comments in *Letter 1* from the California Department of Fish and Wildlife on the topics of wildlife movement and wildlife corridors available for mountain lions. As presented in these responses, the Project site is not located in a wildlife corridor or within the identified home territory of any mountain lions. As discussed in Section 5.3: Biological Resources in the Draft EIR, on pages 5.3-52 to 5.3-54 and pages 5.3-93 to 5.3-96, the Project would have a less-than-significant impact on wildlife movement, wildlife corridors, and mountain lions. The Project will contribute to a significant cumulative impact on mountain lion movement and mitigation for the contribution of the Project to this cumulative impact is identified.

Comment 9-18:

Hazards as disclosed in the Phase I Environment Report, Appendix H The following hazards are discussed in the phase one report for this project and disclosed in the Draft EIR, but no mitigation to address or reduce them is included.

Methane from an abandoned oil well.

As stated on Page 7 of the Phase I Environmental Investigation:

"Based on information from prior consultants and Mr. Williams, an abandoned oil well is present on the Site. This former oil well was previously a part of the Halsey Canyon Oil Field and was installed to a depth of approximately 3,600 feet in 1920. From records obtained from the Division of Oil, Gas and Geothermal Resources (DOGGR), this abandoned oil well was identified as Fernando Oil Well Company No. 1. This oil well was abandoned in 1923. According to Title 26 of the California Building Code, no new building permits are approved for structures within 300 feet of an abandoned oil well. The most effective means of limiting any future concerns with methane is to conduct a methane survey. This would only be required if development was to occur."

The Environmental Report also recommends "re-abandoning" the well to ensure proper abandonment.

- We therefore ask that a condition of approval requiring re-abandonment of this well and that a methane survey be conducted be added to the mitigation for this project.

Response 9-18:

As analyzed in Section 5.8: Hazards and Hazardous Materials, of the Draft EIR, an abandoned oil well is present within the northwest portion of the VTTM site, within a proposed debris basin. This former oil well was previously a part of the Halsey Canyon Oil Field and was installed to a depth of approximately 3,600 feet in 1920. From records obtained from the Division of Oil, Gas and Geothermal Resources (DOGGR) now known as the California Geologic Energy Management Division (CalGEM), this abandoned oil well was identified as Fernando Oil Well Company No. 1. This oil well was abandoned in 1923.

As stated on page 5.8-19 of the Draft EIR, the former oil well on the VTTM site would be remediated and re-abandoned in accordance with current CalGEM requirements and County requirements. In accordance with California Public Resources Code Section 3229, a written notice of intention to abandon the well will be filed with CalGEM as required by California State Division of Oil, Gas and Geothermal Resources form OG108.

As re-abandonment of this well is already required by existing regulations, a condition of approval is not required.

Comment 9-19:

Greenhouse Gases

We are in a climate emergency[10] and MUST begin to reduce greenhouse gases in order to keep global temperatures at a level in which all life forms that we currently know can survive. GHG are increasing heat

waves and wildfires, and reducing water supply in California[11] among other local impacts and are causing billions of dollars in damage.[12]

The Draft EIR recognizes the sources of these impacts, including this project, where it states:

Sources of Greenhouse *Gas Emissions*

With respect to anthropogenic activities, motor vehicle travel, air travel, consumption of fossil fuels for power generation, industrial processes, heating and cooling, landfills, agriculture, and wildfire are the primary sources of GHG emissions. Additionally, land use decisions and future development projects pursuant to implementation of a general plan can affect the generation of GHG emissions from multiple sectors, resulting in direct or indirect GHG emissions. For example, electricity consumed in the lighting and heating of buildings is an indirect source of GHG emissions because it requires electricity from power plants, which emit GHG directly into the atmosphere. Conversely, tailpipe emissions from the use of vehicles generate direct GHG emissions."[13]

Building auto oriented urban sprawl projects such as this project causes significant generation of GHG. We must stop fooling ourselves and begin to address the indirect causes of GHG emissions if we are ever to get global warming under control. Unlike the information in the EIR which would have us believe everything will be mitigated by using more efficient construction equipment, the project itself will continue to be a major producer of GHG as long as it is inhabited, through energy use and auto trips for its residents. These impacts must be mitigated.

- Like other housing developments recently approved, the County must, at the very least, condition this project to require roof top solar and electric car plug ins, in addition to other low-impact housing requirements that will reduce energy and water use.

Response 9-19:

As analyzed in Section 5.7: Greenhouse Gas Emission, of the Draft EIR, impacts related to direct and indirect emissions of greenhouse gas emissions would be less than significant. Construction assumptions used in the analysis of GHG emissions conservatively assume that the Project would be constructed with the most intensive activities occurring on a daily basis. Construction emissions were amortized over the 30-year lifetime of the Project, as recommended by SCAQMD, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. Total GHG emissions from the construction activities are forecast to be 7,603 MTCO2e. The total GHG emissions were amortized over a 30-year Project lifetime and forecast to be 253 MTCO2e per year. The total operational greenhouse gas emissions are estimated to be approximately 1,580 MTCO2e per year. The Project would incorporate energy and water efficiency design features to enhance efficiency in all aspects of the life cycle of the Project's buildings based on the latest CALGreen and Title 24 Building Energy Efficiency standards, as amended by the County, for new residential construction and commercial uses; thereby further reducing the Project's GHG emissions. In the absence of any adopted, numeric threshold, the County

evaluates the significance of a project by considering whether the project conflicts with applicable land use designations and regulations and actions identified in the adopted Community Climate Action Plan (CCAP). As discussed in the Draft EIR, the Project would be consistent with existing land use and zoning designations and development of the Project is included in regional growth forecasts.

As discussed in the Draft EIR, the Project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. The County's adopted CCAP establishes a GHG reduction target that is consistent with AB 32 and the draft CAP provides further actions consistent with SB 32 and EO B-55-18. The Project's significance with respect to GHG emissions is evaluated based on its consistency with applicable GHG reduction actions in the County's adopted CCAP and draft CAP. The Project is consistent with the applicable actions in the CCAP as it would implement many of the actions and policies the County has outlined as important to reducing GHG emissions in the unincorporated areas, see Table 5.7-11: Consistency with the County Community Climate Action Plan of the Draft EIR, page 5.7-40. In accordance with CEQA Guidelines Section 15183.5, which specifies that CEQA project evaluation of GHG emissions can "tier off" a programmatic analysis of GHG emissions, such as the adopted CCAP and draft CAP, the Project would result in less than significant GHG emissions.

Cumulative impacts with respect to GHG emissions would be less than significant. The Project is consistent with existing land use and zone designations and would be consistent with applicable County CCAP actions, County draft CAP actions, the Los Angeles County Green Building Program, SCAG's SCS policies, and would incorporate applicable mitigation measures set forth in the 2016—2040 RTP/SCS, 2020—2045 RTP/SCS, and the SCVAP 2012 Program EIRs to reduce GHG emissions. As the SB 375 CEQA streamlining requirements have been met, additional CEQA analysis of cumulative GHG impacts from cars and light-duty trucks is not required pursuant to the provisions set forth in SB 375 and Public Resources Code Section 21159.28. The Project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions in 2020, 2030, and/or 2050. The Project's contribution to cumulative impact of GHG emissions would not be cumulatively considerable and would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. As with the Project, the related projects would be required to comply with all applicable plans, policies, or regulations, including the County's CCAP, CAP, Green Building Program, and AB32, which are intended to reduce GHG emissions.

The Project would conform with current County zoning standards requiring the installation of electric vehicle (EV) charging stations. The proposed commercial uses would be required to provide EV charging facilities per CALGreen requirements, and all residential units would have solar and the capability for EV charging. The Project would comply with Title 24 and the energy efficiency measures in the County's Green Building Ordinance, which require the Project's residential buildings to install solar photovoltaic (PV)

systems, residential buildings to have the capability for EV charging, and the installation of EV charging stations for the commercial use. The Project would also include energy efficient appliances per the 2019 California Building Standards Code.

Comment 9-20:

Signage and Notice was not provided in Spanish

A majority of Val Verde, the nearest community to this project, is Spanish-speaking. We objected during the NOP process that posted signs and notices should be provided in Spanish because the community is statistically a majority Hispanic community and a large percentage of the community speaks Spanish at home. No notices or signage where provided in that language. This results in barriers to participation for many of the affected members of the community because they cannot participate in their native language.

Although the County stated at the scoping hearing that materials were available in Spanish, none of the materials received by our group were translated into Spanish nor did any statement appear in Spanish offering to answer questions.

Response 9-20:

All noticing was completed in accordance with applicable County standards.

Comment 9-21:

In addition, we were given only seven days' notice for the public hearing on the Draft EIR. This was not a sufficient time to review the recently released EIR or notify other interested parties. For these reasons we urge you to hold a second public hearing on the Draft EIR.

Response 9-21:

The County issued the Notice of the December 14, 2021, Hearing Examiner Public Meeting and Notice of Completion and Availability of the Draft Environmental Impact Report for review on November 10, 2021. The notice for the December 14, 2021, public meeting was, therefore, 34 days and not 7 days as stated in this comment.

Also, please note that this public meeting to accept public comments on the Draft EIR was not required by CEQA or the CEQA Guidelines, nor was it the only opportunity provided to comment on the Draft EIR. A 45-day public review period for the Draft EIR was required by the CEQA Guidelines. The County established a 60-day review period for the Draft EIR to provide adequate time for review and comments on the Draft EIR.

Comment 9-22:

Conclusion

We ask that you address the additional items that we have identified for disclosure and, change the Wildfire impact to "significant" and include the bulleted suggested conditions and mitigations to the final document.

In light of the extreme fire danger to existing and future residents caused by adding additional units to this area without adequate evacuation, we cannot support the approval of this project.

Response 9-22:

Please see the responses to the previous comments in this letter, above.

Comment 9-23:

The following storm drain analysis is based on a flow rate of 84cfs. With a slope of .05 and n=0.015 for roughness, a 36-inch diameter pipe will experience near full capacity for a given length of 500 to 1000 feet (Exhibit #1). A headwater was chosen as 5 with inlet control since the storm drain outlet at the infiltration basin #406A will not be submerged. This is a general overview to show that given the hydrology data shown in Exhibit #2 and the analysis shown in Exhibit #5, it is certain that a storm drain with diameter 48" or possibly larger is required. Exhibit #3 shows the storm drain with referenced profile (Exhibit#4). It can be seen that the outlet condition represents several issues;

1) A pipe with a minimum of 36" in diameter creates an obstruction in the road as the pipe is exposed.
2) The slope of the pipe becomes flat in order to make invert at grade of 1193.5. This represents a flow rate problem as capacities of pipes decrease significantly as the slope becomes less which would require an even larger diameter to maintain capacity.
3) The catch basin which feeds the radius is below the required invert and has created a negative flow. The catch basin will not function as intended and will become a source of storm runoff.

Response 9-23:

Final details for the storm drain profile, pipe alignments, pipe sizing, and catch basin locations will be determined through the preparation of the final storm drain design, which will be reviewed and approved by the County's Public Works Department prior to issuance of grading permits. The final alignments for all drainage pipes will be designed to meet all Los Angeles County design requirements.

Comment 9-24:

Page 10 of hydrology perf basin-4 (Node 406A) identified on the Water Quality Map is located in section 6?

Subarea 406A is not 2 acres, its 0.28 acres. Drawdown of 10.6 hours is calculated based on infiltration of 1.7 in/hr. How is the performance due to silt depositing addressed? This drawdown assumes 1.7 in/hr without loss of performance.

Response 9-24:

Subarea 406A as defined in the approved hydrology study is 2.0 acres. The infiltration basin is located immediately downstream from this basin. The infiltration rate of 1.7 in/hr used in the design of this basin is the design infiltration rate which takes into account possible silting between maintenance and cleaning of the basin. The measured infiltration rate is higher and is reduced with factors of safety to determine the design rate. In addition, the 10.6-hour drawdown is only 11% of the allowable 96 hours, therefore there will be no loss of performance in the infiltration rate for this basin.

Comment 9-25:

Perc Basin 203A is below historical high ground water of 10’ below grade. How is this addressed in drawdown?

Response 9-25:

The ground water at the location of perc basin 203A was evaluated in the referenced geotechnical reports in accordance with Administrative Manual GS200.2 (dated 6/30/17), Guidelines for Geotechnical Investigation and Reporting, Low Impact Development Stormwater Infiltration, prepared by the County of Los Angeles Department of Public Works, Geotechnical and Materials Engineering Division (GMED).

In accordance with the GMED Manual percolation basins are required to maintain a 10-foot separation between the infiltration invert elevation and seasonal high groundwater elevation, not the historic high groundwater contours identified in the Seismic Hazard Zone Report. Therefore, the historic high groundwater of 10 feet below existing grade is not applicable to the drawdown analysis. Site-specific exploration and groundwater level monitoring data obtained at the Project site were used to determine that seasonal high groundwater elevations are significantly deeper than historic high groundwater contours. Based on this site-specific groundwater monitoring data, it was determined that the invert elevation for Perc Basin 203A is at least 10 feet above the seasonal high groundwater elevation.

Comment 9-26:

Bottom of access road is at elevation of 19. The bottom of the basin is a 1305 which gives 14 feet of unsupported grade for road. Also, no supporting 2:1 slope for road access. Unless fills are vertical?

Response 9-26:

This basin is Node 131 per the approved hydrology report. The bottom of the basin is being filled to an elevation of 1,319 feet. The calculations in the approved hydrology report show a debris cone elevation of

1,320.9. This basin and access road will be graded to the elevations shown on the approved hydrology report and will not have an unsupported grade for the road.

Comment 9-27:

Access road to elevation 19 requires fill slope to support. Volume of basin has to be reevaluated based on loss due to fill placement.

Response 9-27:

This basin is Node 130D in the approved hydrology report. The bottom of the basin is being filled to an elevation of 1,319 feet. The calculations per the approved hydrology report show a debris cone elevation of 1,321.3. There is no loss in volume due to the grade that requires reevaluation.

Comment 9-28:

Basin requires 28 feet of cut next to property line. Where is 56 feet of cut slope. Basin requires reevaluation of volume due to grade loss.

Response 9-28:

This is basin 105B in the approved hydrology report. The bottom of the basin is being cut to an elevation of 1,282 with a 2:1 slope on the northerly side of this basin. The volume for the basin is calculated based on the proposed grading. The calculations per the approved hydrology report show a debris cone elevation of 1,287.9 feet. There is no loss in volume due to the grade that requires reevaluation.

November 18, 2021

Re: Letter of endorsement for Sterling Ranch Estates

To whom it may concern:

SCV Trail Users ("SCVTU") is a committee of the Concerned Off Road Bicyclists Association, a nonprofit organization. SCVTU is a volunteer-based organization which works with land managers in and around the Santa Clarita valley to help design, build and/or maintain multi-use trails. We work with the City of Santa Clarita, the County of Los Angeles, and the U.S. Forest Service.

A representative from SCVTU met with Hunt Williams, representing Sterling Ranch Estates, to review the trail plan for the proposed Sterling Ranch Estates project. We met at the project site to drive, hike and review each proposed trail and open space planned for the project. We spent 90 minutes reviewing plans and walking the property while Mr. Williams showed trail alignments, views and accepted input about the trail plans.

The primary purpose of SCVTU is to advocate for trail opportunities for the people in and around Santa Clarita and we are excited to see the planners for Sterling Ranch Estates proactively developing trails with beautiful vistas that help connect and complete the LA County Master Trail Plan west of the I-5 freeway and north of the 126 highway. This area needs more trails and though the LA County Master Trail Plan has miles of trails proposed in this area, few of them will be realized unless the land is developed. SCVTU endorses the Sterling Ranch Estates project from the perspective of the added new trails that will be delivered with the project and we at SCVTU remain neutral with respect to the housing tract development. We are pleased that Mr. Williams is focused on delivering beautiful trail options with the project and look forward to seeing these parts of the Master Trail Plan built for community use.

10-1

Sincerely,

Anthony Arnold, Member
SCV Trail Users
A Committee of The Concerned Off Road Bicyclists Association

SCV Trail Users 27441 Tourney Road, Suite 200, Valencia, CA 91355

COMMENT LETTER NO. 10:

Anthony Arnold
Member SCV Trail Users
A Committee of The Concerned Off Road Bicyclists Association
27441 Tourney Road
Suite 200
Valencia, CA 91355

Comment 10-1:

SCV Trail Users ("SCVTU") is a committee of the Concerned Off Road Bicyclists Association, a nonprofit organization. SCVTU is a volunteer-based organization which works with land managers in and around the Santa Clarita valley to help design, build and/or maintain multi-use trails. We work with the City of Santa Clarita, the County of Los Angeles, and the U.S. Forest Service.

A representative from SCVTU met with Hunt Williams, representing Sterling Ranch Estates, to review the trail plan for the proposed Sterling Ranch Estates project. We met at the project site to drive, hike and review each proposed trail and open space planned for the project. We spent 90 minutes reviewing plans and walking the property while Mr. Williams showed trail alignments, views and accepted input about the trail plans.

The primary purpose of SCVTU is to advocate for trail opportunities for the people in and around Santa Clarita and we are excited to see the planners for Sterling Ranch Estates proactively developing trails with beautiful vistas that help connect and complete the LA County Master Trail Plan west of the I-5 freeway and north of the 126 highway. This area needs more trails and though the LA County Master Trail Plan has miles of trails proposed in this area, few of them will be realized unless the land is developed. SCVTU endorses the Sterling Ranch Estates project from the perspective of the added new trails that will be delivered with the project and we at SCVTU remain neutral with respect to the housing tract development. We are pleased that Mr. Williams is focused on delivering beautiful trail options with the project and look forward to seeing these parts of the Master Trail Plan built for community use.

Response 10-1:

This comment expresses general support for the Project and cites some of the Project features. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration. This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no further response is necessary.

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WILDLAND URBAN WILDFIRE COMMITTEE

1-9-22

Mr. Jodie Sackett
Los Angeles Dept. of Regional Planning
320 W. Temple St.
Los Angeles, CA 90012

Sent via email to jsackett@planning.lacounty.gov

Re: Sterling Ranch DEIR **VTPM No.** 060257 and associated permits

Dear. Mr. Sackett:

The Sierra Club Angeles Chapter Wildland Urban Wildfire Committee (Wildfire Committee) was formed to address land use planning and safety policies related to the increasing intensity and frequency of wildfires in the Wildland-Urban Interface (WUI).[1] Our mission is to assess the risks associated with building in the Very High Fire Hazard Severity Zones (VHFHSZs) in Los Angeles and Orange Counties and influence decision-makers to reduce those dangers while protecting the environment through education, organizing, and policy change. Oftentimes projects are considered and approved in spite of the wildfire risk to current and future residents, wildlife, and habitat and there is a failure to consider the huge cost to the public.

11-1

The developer of Sterling Ranch proposes to create 222 detached single-family residential lots on 57.9 acres, as well as additional infrastructure and three debris basins in the rural community of Val Verde, increasing its current population by approximately 25%.

11-2

Wild Fire Analysis
The project is located in a Very High Fire Hazard Severity Zone with only one two-lane road in an out of the community (see photo at left, ingress/egress marked in red).

11-3

<u>Compliance with LA County Fire Code</u>
Subdivisions Code Section 21.24.020(A)(1) allows up to 150 units along a single route of access if the street or street system 1) connects to a highway, and 2) does not traverse a wildland. (The

11-4

[1] WUI is defined as areas adjacent to or of transition between wildlands and human development and its associated infrastructure in which severe wildfire hazards are increasingly likely due to flammable native and non-native wildland vegetation, hazardous weather patterns, and steep topography. These areas have been designated as Very High Fire Hazard Severity Zones by Cal Fire.

Ordinance can be found in an endnote for your reference.)[i] We therefore do not believe that this project complies with the County fire code. 11-4

Wild fire must be analyzed as a Significant Impact. A finding of less than significant is not accurate.
The Sterling Ranch DEIR claims that wildfire would have no significant impact on this project (Page 5.8-27). Such conclusions show a cavalier disregard for the growing danger of massive wildfires in VHFHSZs that have become so prevalent in the last few years throughout the state, including the devastating Rye Fire that occurred just south of this project in December 2017. The toll on public safety and the environment in addition to the financial cost of fighting these blazes is no longer acceptable.

Wildfire impacts and hazards (including evacuation) are required to be analyzed according to current CEQA guidelines.[2] When a project exacerbates environmental conditions or hazards it is the project's impact on the environment that "compels an evaluation of how future residents or users could be affected by exacerbated conditions." (*California Building Industry Assn. v. Bay Area Air Quality Management Dist*. (2015) 62 Cal.4th 369.) At a minimum, we urge the Planning Department to acknowledge that a finding of less that significant to for wildfires is not appropriate. 11-5

We therefore assert that in fact the impact must be considered significant and unavoidable. A finding of less than significant can only be reached by not properly analyzing the impacts and over-stating the ability of proposed mitigation to reduce the potential impacts from this development on the environment to less than significant.

The existing proposed mitigation measures remain inadequate both for public safety and impacts to public financial resources. It has clearly been shown by the Camp fire that burned through Paradise, CA, killing 85 people[3] and the Dixie fire that totally destroyed the historic town of Greenville that vegetation clearing and home hardening does not stop wind driven fires. But that is all that is proposed as mitigation for this impact. The services section discusses only the fire department's response time for house or other residential fires, but does not discuss the Fire Department's ability to respond to a major wildfire in the area.

In fact, **07/21/20 Fire Behavior Analysis and Report**[4] finds the following for at least one fire scenario: 11-6
"Due to the size and extent of the line of fire vs the point source fire, the fire travel and arrival times are much sooner to the access roadway. The complete length of Del Valle Road is impacted in under

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[2] CEQA guidelines have been updated to require an analysis of a project's wildfire impacts for projects "in or near state responsibility areas or lands classified as very high fire hazard severity zones" to determine whether the project would:

- substantially impair adopted emergency response or evacuation plans,
- exacerbate wildfire risks due to slope, prevailing winds, or other factors and expose project occupants to pollutant concentrations from a wildfire or uncontrollable spread of wildfire,
- require installation/maintenance of wildfire associated infrastructure (roads, fire breaks, water resources, power lines, other utilities) that may exacerbate fire risks or result in environmental impacts, or
- expose people or structures to significant post-fire risks, such as downslope or downstream flooding/landslides, slope instability, drainage changes

See revised Appendix G adding a new section XX on the need to address project wildfire impacts (p. 10 at the following link: http://califaep.org/docs/2019-Appendix_G_Checklist.pdf)

[3] https://www.latimes.com/local/california/la-me-camp-fire-deathtrap-20181230-story.html

[4] Sterling Ranch DEIR Appendix P, Page 39-40

24 minutes and the fire front reaches the Chiquito Canyon Road in 48 minutes. This is the scenario that would require the incident commander(s) or field officer of the fire and law enforcement agencies to decide on how to protect the citizens. Below is a simple decision tree for evacuation vs. protecting people in place. Evacuation is always the preferred option but sometimes, it is not possible. It should be noted that the scenario runs from the time the fire impacts Halsey Canyon Road. This fire would have already been burning and would no doubt be discovered and emergency personnel would be working on the decision below before the fire came to the point of the scenario but ***the modeling shows that if the fire reaches this point, evacuation is not a likely choice. If there is not enough time to safely move the population at risk to an uninvolved area, consideration of where to best protect them is the next action on the decision tree.''***
[Emphasis added]

11-6

With many dead end streets and box canyons in the Val Verde area and only one two-way road in and out, residents would be trapped with nowhere to go. This chilling statement clearly shows the wildfire danger to current and future residents with the addition of this project.

11-7

<u>The Project fails to conform to the Los Angeles County General Plan</u>

Goal LU-3: Healthy Neighborhoods. Healthy and safe neighborhoods for all residents.
Policy LU-3.3.2: In areas subject to wildland fire danger, ensure that land uses have adequate setbacks, fuel modification areas, and emergency access routes.
Policy LU-3.3.3: Through the development review process, ensure that all new residential development is provided with adequate emergency access and that subdivision and site designs permit ready access by public safety personnel.

As described above, access is inadequate to protect public safety and provide safe evacuation in a fast-moving, wind-driven wildfire. Therefore, this project is not consistent with the General Plan Policies and Goals.

11-8

<u>The project does not conform to recent Board of Supervisor actions</u>

In 2020, the Los Angeles County Board of Supervisors passed resolutions calling for evacuation plans and analysis of the time needed for evacuation. The services section states that the fire department response time for house or other fires, is around 8-12 minutes and how long a wildfire might take to reach the community (as described above). It does ***not*** discuss the Fire Department's ability to respond or the length of time needed to evacuate future residents of this development in addition to the existing community for a major wildfire in the area. Instead, we are presented with a scenario where evacuation may not be possible at all.

11-9

<u>Fuel modification will affect wildland, open space and habitat, including Mountain Lion Habitat</u>

Since this project site is located within Fire Zone 4, which is a Very High Fire Hazard Severity Zone that falls within the State Responsibility Area (SRA), a fuel modification plan for the perimeter portions of the proposed development envelope would be required and has been conceptually approved by the County Fire Department. This fuel modification will affect wildland and preserved open space and habitat. This Includes wildlife movement areas used by the Southern CA Mountain Lion which has recently been proposed for listing under the ESA. This project will affect mountain lion habitat both by the destruction of a canyon used by these rare animals as well as vegetation destruction required by fuel modification. These issues were not addressed in the MND. Further, an MND is not a sufficient document under which to evaluate impacts to an endangered species.

11-10

Expense

Defending this area from wildfires will continue to be very expensive for the County. We ask that the Supervisors request a cost-of-services study for this development and begin to generate fees to ensure that adequate financing of fire services can be provided if this project is approved.

11-11

Conclusion

Experts agree that human-sparked wildfires are more frequent, faster spreading, and more destructive than those caused by nature.[5]

- Wildfires have become more destructive due to climate change, historic fire suppression and development in wildlands.[6]
- When houses are built close to natural vegetation, they pose two problems related to wildfires. First, there will be more wildfires due to human ignitions. Second, wildfires that occur will pose a greater risk to lives and homes, and they will be hard to fight.[7]
- To stem the escalating loss of life and property, the state needs to curb development in high fire-hazard zones.[8]
- To stop the destruction of our communities by wildfire in our rapidly changing environment we must reduce the flammability of existing communities and prevent new ones from being built in very high fire hazard severity zones.[9]
- California's increasingly deadly and destructive wildfires have become so unpredictable that government officials should consider banning new home construction in vulnerable areas.[10]
- The best way to prevent wildfire destruction and death is to stop building houses in the path of fire.[11]

11-12

Based on overwhelming research and evidence concluding that people and structures near wildland areas are the primary driver of destructive wildfires, the Wildfire Committee sponsored a resolution, which Sierra Club California adopted last year. The Los Angeles County Democratic Party passed a similar resolution shortly thereafter. Both adopted new policies address the importance of restricting development in fire-prone areas:

- Sierra Club California: "supports policies that prohibit new building in Very High Fire Hazard Severity Zones, consistent with established Sierra Club infill policy, to respond to increasing intensity and frequency of devastating wildfires on lives, habitat, property, infrastructure, and the environment." (Adopted: August 22, 2020)

- The Los Angeles County Democratic Party: "calls on our state leaders to reconsider the approval of increased developments in Very High Fire Hazard Severity Zones near or in wildland-urban interface areas, and seeks strong regulations and limits on new structures,

[5] https://www.sciencemag.org/news/2020/12/human-sparked-wildfires-are-more-destructive-those-caused-nature
[6] Fanning the Flames: The Reality of Climate Change and Wildfires in California, https://www.youtube.com/watch?v=BFaDz_NyYX8
[7] https://www.pnas.org/content/115/13/3314
[8] https://www.latimes.com/projects/wildfire-california-fuel-breaks-newsom-paradise/
[9] https://www.sierraclub.org/sites/www.sierraclub.org/files/sce/sierra-club-california/PDFs/GovNewsom_Wildfires_2019.pdf
[10] https://apnews.com/article/d2f76432db1749d4918e55624a47c654
[11] https://www.latimes.com/opinion/story/2019-11-29/california-wildfire-housing-ideas

as these buildings have been found to increase the size and destructive nature of our state's worst fires." (Adopted: September 22, 2020)

Public opinion supports the recommendations of scientists and fire experts to restrict building in fire-prone areas. A 2019 Analysis of Quality of Life Index by UCLA's Luskin School of Public Affairs (see page 5, figure 8) found that 73 percent of those surveyed believe that the construction of new homes should be prohibited in high risk fire areas. Only 20 percent disagreed.[12]

We oppose this development in a VHFHSZ because it would put existing and future residents in harm's way in the event of a wind-driven wildfire. It would also endanger existing residents as they attempt to evacuate on a residential street where many additional cars would add to an already difficult evacuation problem. ***The DEIR is deficient in failing to analyze the time required to evacuate and the project's potential to slow the evacuation of others in the community (with possible deadly results), creating an unacceptable risk to public safety.***

11-12

For all the reasons listed above, the Sierra Club Wildland Urban Wildfire Committee opposes further incursions into very high fire hazard severity zones, especially in areas that have limited evacuation routes and pose a serious danger to current and future residents. We also oppose such projects due to the rising costs associated with defending lives and property due to the increased occurrence of wildfires as temperatures rise creating drier and hotter conditions due to climate change.

Thank you for considering our comments.

Sincerely,

Members of the Wildland Urban Wildfire Committee
Sierra Club, Angeles Chapter

[12] https://ucla.app.box.com/s/t8bb9h8lg48fbfp4l1yz1c6rs35tdmf5

[i] *21.24.020* - Restricted residential access.
A. If *a* street or street system is restricted to *a* single route of access to *a* highway shown on the Highway Plan, except for *a* limited secondary highway, which is maintained and open to public travel, whether at the point of intersection with the highway or at some point distant from the highway, the street or street system shall serve not more than:
1. 150 dwelling units where the restriction is designed to be permanent and the street or street system does not traverse *a* wildland area which is subject to hazard from brush or forest fire;
2. 75 dwelling units where the restriction is designed to be permanent and the street or street system traverses *a* wildland area which is subject to hazard from brush or forest fire;
3. 300 dwelling units, where the restriction is subject to removal through future development.
B. If the roadway paving on that portion of the street or street system forming the restriction is less than 36 feet in width and is not to be widened to 36 feet or more as *a* part of the development of the division of land, the permitted number of dwelling units shall be reduced by 25 percent if the pavement is 28 feet or more in width, and by 50 percent if the pavement is less than 28 feet in width. If the roadway paving on that portion of the street or street system forming the restriction is 64 feet or more in width and the restriction is subject to removal through future development, the permitted number of dwelling units may be increased to 600. In no event shall the pavement width be less than 20 feet. The provisions of this section shall not apply to divisions of land referred to in Section *21.32.040* to divisions of land approved pursuant to Section *21.32.080*, or to minor land divisions.
(Ord. 85-0168 § 2, 1985; Ord. 10485 § 4, 1972: Ord. 4478 Art. 4 § 40.2, 1945.)
21.24.030 - Wildland access.
Notwithstanding the provisions of Sections *21.24.020* and *21.24.190*, the advisory agency may disapprove *a* design of *a* division of land which utilizes *a* cul-de-sac or branching street system or other single-access street or street system as the sole or principal means of access to lots within the division, where the forester and fire warden advises:
A. That the street or street system will traverse *a* wildland area which is subject to extreme hazard from brush or forest fires;
B. That the lack of *a* second route of access would unduly hinder public evacuation and the deployment of fire-fighting and other emergency equipment in the event of *a* brush or forest fire.
(Ord. 10485 § 3, 1972: Ord. 4478 Art. 4 § 40.*1*, 1945.)

COMMENT LETTER NO. 11:

Members of the Wildland Urban Wildfire Committee Sierra Club, Angeles Chapter
3250 Wilshire Boulevard
Suite 1106
Los Angeles, CA 90010

Comment 11-1:

The Sierra Club Angeles Chapter Wildland Urban Wildfire Committee (Wildfire Committee) was formed to address land use planning and safety policies related to the increasing intensity and frequency of wildfires in the Wildland-Urban Interface (WUI).[1] Our mission is to assess the risks associated with building in the Very High Fire Hazard Severity Zones (VHFHSZs) in Los Angeles and Orange Counties and influence decision-makers to reduce those dangers while protecting the environment through education, organizing, and policy change. Oftentimes projects are considered and approved in spite of the wildfire risk to current and future residents, wildlife, and habitat and there is a failure to consider the huge cost to the public.

Response 11-1:

This comment introduces the Wildfire Committee and its purpose. This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no further response is necessary.

Comment 11-2:

The developer of Sterling Ranch proposes to create 222 detached single-family residential lots on 57.9 acres, as well as additional infrastructure and three debris basins in the rural community of Val Verde, increasing its current population by approximately 25%.

Response 11-2:

Please see *Response 9-2*. This comment presents a summary description of the Project. This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no further response is necessary.

Comment 11-3:

Wild Fire Analysis

The project is located in a Very High Fire Hazard Severity Zone with only one two-lane road in an out of the community (see photo at left, ingress/egress marked in red).

Response 11-3:

Please see *Responses 7-19* and *9-3* for a discussion of the analysis of evacuation during a wildfire. The Project site has two existing access roadways - Del Valle Road and Chiquito Canyon Road.

Comment 11-4:

Compliance with LA County Fire Code Subdivisions Code

Section 21.24.020(A)(1) allows up to 150 units along a single route of access if the street or street system 1) connects to a highway, and 2) does not traverse a wildland. (The Ordinance can be found in an endnote for your reference.)[i] We therefore do not believe that this project complies with the County fire code.

Response 11-4:

This comment references a section of the code that applies to sites with restricted residential access. As the Project has two points of access, this section of the code does not apply, and the Project conforms with the applicable standards in the County Fire Code. As described on page 3.0-18 of the Draft EIR in the Project Description, vehicular access will be provided from the extension of Chiquito Canyon Road into the site as Sterling Parkway and from Del Valle Road.

Comment 11-5:

Wild fire must be analyzed as a Significant Impact. A finding of less than significant is not accurate.

The Sterling Ranch Draft EIR claims that wildfire would have no significant impact on this project (Page 5.8-27). Such conclusions show a cavalier disregard for the growing danger of massive wildfires in VHFHSZs that have become so prevalent in the last few years throughout the state, including the devastating Rye Fire that occurred just south of this project in December 2017. The toll on public safety and the environment in addition to the financial cost of fighting these blazes is no longer acceptable.

Wildfire impacts and hazards (including evacuation) are required to be analyzed according to current CEQA guidelines.[2] When a project exacerbates environmental conditions or hazards it is the project's impact on the environment that "compels an evaluation of how future residents or users could be affected by exacerbated conditions." (*California Building Industry Assn. v. Bay Area Air Quality Management Dist*. (2015) 62 Cal.4th 369.) At a minimum, we urge the Planning Department to acknowledge that a finding of less that significant to for wildfires is not appropriate.

We therefore assert that in fact the impact must be considered significant and unavoidable. A finding of less than significant can only be reached by not properly analyzing the impacts and over- stating the ability of proposed mitigation to reduce the potential impacts from this development on the environment to less than significant.

The existing proposed mitigation measures remain inadequate both for public safety and impacts to public financial resources. It has clearly been shown by the Camp fire that burned through Paradise, CA, killing 85 people[3] and the Dixie fire that totally destroyed the historic town of Greenville that vegetation clearing and home hardening does not stop wind driven fires. But that is all that is proposed as mitigation for this impact. The services section discusses only the fire department's response time for house or other residential fires, but does not discuss the Fire Department's ability to respond to a major wildfire in the area.

Response 11-5:

Please see *Response 9-5*, above. Wildfire impacts are evaluated in Section 5.8: Hazards and Hazardous Materials and in Section 5.18: Wildfire of the Draft EIR. Based on substantial evidence from the Fire Behavior Analysis and Report, included as Appendix P to the Draft EIR, the Project would comply with all proposed State and County requirements related to land management within a Very High Fire Hazard Severity Zone, including an approved Fuel Modification Plan. The Project would be constructed in compliance with applicable CBSC and CFC regulations that would ensure that appropriate measures, including fire prevention and fuel modification features, are provided, so that urban development would not expose Project occupants to increased and uncontrolled wildfire hazards. The Project would meet fire hardening requirements for projects located in a Very High Fire Hazard Severity Zone, including Chapter 7A of the California Building Code, Chapter 49 of the California Fire Code, and Section R337 of the California Residential Code as adopted and amended by the County of Los Angeles. The Project would be designed and developed in accordance with the County Building Code requirements and has an approved fuel modification plan that meets the criteria for the development area. The Fire Behavior Analysis and Report concludes that only limited fire resources would be required to protect the Project site due to radiant heat mitigations, ember resistance and limited use of combustible materials on the exterior of the structures, wide streets, good water supply, and defensible space around the structures.

Section 5.8: Hazards and Hazardous Materials of the Draft EIR identifies that the LACoFD relies on the nationally recognized response time of five minutes for the first arriving unit for fire services. As the Project is located in a suburban area, fire and emergency response times of seven to eight minutes are expected. The LACoFD estimated an emergency response time of 6.5 minutes from Fire Station 143 and just over seven minutes from Fire Station 76 for first responding units. Should a significant incident occur, the resources of the entire LACoFD, not just the stations closest to the Project site, would be used. To minimize impediments to emergency access, all on-site roadways have been designed in compliance with the Fire Code and County standards and requirements. The Project includes a comprehensive circulation plan that provides access to the VTTM site and facilitates vehicular circulation throughout the Project site in accordance with County standards. To minimize impediments to emergency access, all on-site roadways would be designed in compliance with the CFC and LACoFD standards and requirements.

The Project would construct a one-million-gallon water tank in the Off-Site Water Tank Area. The water tank would be sized to accommodate the Project and additional fire-fighting capacity in the surrounding Val Verde community, in accordance with Los Angeles County Waterworks District No. 36 requirements. As discussed in the Draft EIR, the Project would also not substantially impair any adopted emergency response plan or emergency evacuation plan or the ability of residents of the existing community of Val Verde or the Project to safely evacuate in the event of a fire in the area. Implementation of the Project,

combined with other projects within the Val Verde/Castaic area, would not result in increased wildfire hazard risks. Implementation of the Project combined with other development in this area would not result in increased exposure to wildfire risks. Implementation of the Project would not result in adverse wildfire conditions and wildfire impacts would be less than significant.

Comment 11-6:

In fact, **07/21/20 Fire Behavior Analysis and Report**[4] finds the following for at least one fire scenario:

"Due to the size and extent of the line of fire vs the point source fire, the fire travel and arrival times are much sooner to the access roadway. The complete length of Del Valle Road is impacted in under 24 minutes and the fire front reaches the Chiquito Canyon Road in 48 minutes. This is the scenario that would require the incident commander(s) or field officer of the fire and law enforcement agencies to decide on how to protect the citizens. Below is a simple decision tree for evacuation vs. protecting people in place. Evacuation is always the preferred option but sometimes, it is not possible. It should be noted that the scenario runs from the time the fire impacts Halsey Canyon Road. This fire would have already been burning and would no doubt be discovered and emergency personnel would be working on the decision below before the fire came to the point of the scenario but ***the modeling shows that if the fire reaches this point, evacuation is not a likely choice. If there is not enough time to safely move the population at risk to an uninvolved area, consideration of where to best protect them is the next action on the decision tree.''***

[Emphasis added]

Response 11-6:

Please see *Response 9-6* for a discussion of the evacuation analysis in the Fire Behavior Analysis and Report, including the context of the statement highlighted in this comment.

Comment 11-7:

With many dead end streets and box canyons in the Val Verde area and only one two-way road in and out, residents would be trapped with nowhere to go. This chilling statement clearly shows the wildfire danger to current and future residents with the addition of this project.

Response 11-7:

Please see *Response 9-6*, above. As summarized in the responses to the comments in *Comment Letters 7* and *9*, and *Response 11-6* above, the Project will have fuel modifications zones, Chapter 7A/Section R337 construction features (including radiant heat mitigations, ember resistance and limited use of combustible materials on the exterior of the structures), wide streets, good water supply, and defensible space around the structures. Fuels to the north and east of the Project site are light to moderate at the edge of the Project site. Sufficient capacity is available on routes that would be used to evacuate the Project site and adjacent areas in Val Verde, if necessary, during a wildfire. Residents would not, therefore, be trapped as

stated in this comment and, furthermore, if residents are asked to shelter in place during a wildfire, this could be accomplished safely.

Comment 11-8:

The Project fails to conform to the Los Angeles County General Plan

> *Goal LU-3: Healthy Neighborhoods. Healthy and safe neighborhoods for all residents.*
>
> *Policy LU-3.3.2: In areas subject to wildland fire danger, ensure that land uses have adequate setbacks, fuel modification areas, and emergency access routes.*
>
> *Policy LU-3.3.3: Through the development review process, ensure that all new residential development is provided with adequate emergency access and that subdivision and site designs permit ready access by public safety personnel.*

As described above, access is inadequate to protect public safety and provide safe evacuation in a fast-moving, wind-driven wildfire. Therefore, this project is not consistent with the General Plan Policies and Goals.

Response 11-8:

Please see *Response 9-6*, above. Section 5.10: Land Use and Planning, of the Draft EIR, provides analysis of the consistency of the Los Angeles County General Plan policies pertaining to wildfire and fire protection. Table 5.10-1: Los Angeles County General Plan Consistency Analysis, in Section 5.10, includes a list of the wildfire and fire protection policies included in the General Plan and the consistency analysis for each policy.

The Project would be constructed in compliance with applicable CBSC and CFC regulations that would ensure that appropriate measures, including fire prevention and fuel modification features, are provided, so that urban development would not expose Project occupants to increased and uncontrolled wildfire hazards. The Project would be designed and developed in accordance with the County Building Code requirements and has an approved Fuel Modification Plan that meets the criteria for the development area. This plan complies with LACoFD Fuel Modification Plan requirements and would create a buffer area of 200 feet between open space and structures to provide a defensible space for fire suppression forces, slow the rate of spread, and reduce flame lengths and intensities of fires prior to reaching irrigated areas. All proposed plant species, densities, and spacing would comply with LACoFD requirements. The Project would be consistent with Los Angeles County General Plan Policy LU-3.3.2.

Evacuation routes are generally identified by fire protection and law enforcement personnel, are determined based on the location and extent of the incident and include as many predesignated

transportation routes as possible. Primary evacuation routes within the Val Verde community would be accessed through internal neighborhood roadways, which would intersect with the primary ingress/egress roads that intersect off-site primary and major evacuation routes. The Primary Disaster Routes are I-5 located east of the Project site and SR-126 located south of the Project site. As part of the Fire Behavior Analysis and Report, included as Appendix P to the Draft EIR, a Fire Access and Egress Route Analysis of the Project site was conducted to analyze the expected fire behavior—how and when it might impact the community and the access roadways. This Report addresses how a fire might impact the two existing access roadways, Del Valle Road and Chiquito Canyon Road, which provide access to the Project site and the surrounding community. County evacuations follow pre-planned procedures to determine the best evacuation plan for different types of emergencies. Law enforcement agencies, highway/street departments, and public and private transportation providers would conduct evacuation operations. Activities would include law enforcement traffic control, barricades, signal control, and intersection monitoring downstream of the evacuation area, all with the objective of avoiding or minimizing potential backups and evacuation delays. The evacuation process would be managed and phased, based on vulnerability, location, or other factors. This would enable traffic surges on major roadways to be minimized over a longer timeframe and would result in traffic levels that flow more efficiently than mass evacuations that include multiple large evacuation areas simultaneously.

Section 5.8: Hazards and Hazardous Materials, of the Draft EIR, identifies that the LACoFD relies on the nationally recognized response time of five minutes for the first arriving unit for fire services. As the Project is located in a suburban area, fire and emergency response times of seven to eight minutes are expected. The LACoFD estimated an emergency response time of 6.5 minutes from Fire Station 143 and just over seven minutes from Fire Station 76 for first responding units. Should a significant incident occur, the resources of the entire LACoFD, not just the stations closest to the Project site, would be used. To minimize impediments to emergency access, all on-site roadways have been designed in compliance with the Fire Code and County standards and requirements. The Project includes a comprehensive circulation plan that provides access to the VTTM site and facilitates vehicular circulation throughout the Project site in accordance with County standards. To minimize impediments to emergency access, all on-site roadways would be designed in compliance with the CFC and LACoFD standards and requirements. The Project would not result in significant wildfire-related impacts on the Project site or result in a decline in existing service levels in the area. The Project would not substantially impair any adopted emergency response plan or emergency evacuation plan or the ability of residents of the existing community of Val Verde or the Project to safely evacuate in the event of a fire in the area. The Project would be consistent with Los Angeles County General Plan Policy LU-3.3.3.

As discussed in the Draft EIR, implementation of the Project is consistent with the General Plan Policies and Goals. Implementation of the Project, combined with other projects within the Val Verde/Castaic area, would not result in increased wildfire hazard risks. Implementation of the Project combined with other development in this area would not result in increased exposure to wildfire risks. Implementation of the Project would not result in adverse wildfire conditions and wildfire impacts would be less than significant.

Comment 11-9:

The project does not conform to recent Board of Supervisor actions

In 2020, the Los Angeles County Board of Supervisors passed resolutions calling for evacuation plans and analysis of the time needed for evacuation. The services section states that the fire department response time for house or other fires, is around 8-12 minutes and how long a wildfire might take to reach the community (as described above). It does ***not*** discuss the Fire Department's ability to respond or the length of time needed to evacuate future residents of this development in addition to the existing community for a major wildfire in the area. Instead, we are presented with a scenario where evacuation may not be possible at all.

Response 11-9:

Please see *Response 9-7* and *Responses 11-3* to *11-8*, above.

Comment 11-10:

Fuel modification will affect wildland, open space and habitat, including Mountain Lion Habitat

Since this project site is located within Fire Zone 4, which is a Very High Fire Hazard Severity Zone that falls within the State Responsibility Area (SRA), a fuel modification plan for the perimeter portions of the proposed development envelope would be required and has been conceptually approved by the County Fire Department. This fuel modification will affect wildland and preserved open space and habitat. This Includes wildlife movement areas used by the Southern CA Mountain Lion which has recently been proposed for listing under the ESA. This project will affect mountain lion habitat both by the destruction of a canyon used by these rare animals as well as vegetation destruction required by fuel modification. These issues were not addressed in the MND. Further, an MND is not a sufficient document under which to evaluate impacts to an endangered species.

Response 11-10:

Please see the responses to the comments in *Comment Letter 1* from the California Department of Fish and Wildlife. As presented in these responses, due to the existing adjacent residential and industrial development near the Project site, associated existing anthropogenic disturbances, and limited food prey sources, the Project site does not contain high habitat value for mountain lions. Additionally, radiotracking data documents that mountain lion home ranges and dispersal paths have been documented north, west, and south of the Project site through open landscapes in the Los Padres National Forest and Santa Susana

Mountains. Even with vegetation thinning required in fuel modification zones, the Project will not result in significant impacts to mountain lion habitat or to a wildlife corridor used by mountain lions and other wildlife.

This comment states the issues raised in this comment were not addressed in the MND and that an MND is not a sufficient document under which to evaluate impacts to an endangered species. This comment is not correct in stating that an MND was not sufficient, as the County prepared an EIR to evaluate the potential impacts of the Project, including potential impacts to mountain lions.

Comment 11-11:

Expense

Defending this area from wildfires will continue to be very expensive for the County. We ask that the Supervisors request a cost-of-services study for this development and begin to generate fees to ensure that adequate financing of fire services can be provided if this project is approved.

Response 11-11:

Section 5.13.1: Fire Protection, of the Draft EIR, identifies that a Developer Fee Program exists to fund the purchase of station sites, the construction of new stations and facility improvements, and the funding of capital equipment. The Developer Fee is collected at the time building permits are issued and is adjusted annually by the County to reflect changing costs. As of April 2021, the Developer Fee is $1.3120 per square foot of new construction of all land uses. Funding for staffing and operations comes from the LACoFD's share of local property taxes. The Developer Fee Program also allows for funding and land dedication in lieu of payment of fees. Payment of the Developer Fee fully mitigates development impacts. The LACoFD prepares a Five-Year Capital Plan to identify anticipated facilities that would be constructed during the five-year planning horizon. This plan is updated annually. Several fire stations are planned within the Newhall Ranch community to the south, within Lyons Ranch, and within the County south of SR-126 in the Gate-King Industrial Park, and a new Fire Station (No. 104) is currently underway.

The Fire Behavior and Analysis Report in Appendix P of the Draft EIR determined that only limited fire resources would be needed to protect the Project site in the event of a wildfire because the Project would have fuel modifications zones, Chapter 7A/Section R337 construction features (including radiant heat mitigations, ember resistance and limited use of combustible materials on the exterior of the structures), wide streets, good water supply, and defensible space around the structures. For these reasons, the Project would not generate large costs for fire protection.

Please note that under Sections 15064 (e) and Section 15131(a) of the CEQA Guidelines, the economic or social effects of a project shall not be treated as significant effects on the environment. The cost of services

study requested in this comment is not required, therefore, for an adequate analysis of the Project's potential environmental impacts.

Comment 11-12:

Conclusion

Experts agree that human-sparked wildfires are more frequent, faster spreading, and more destructive than those caused by nature.[5]

- Wildfires have become more destructive due to climate change, historic fire suppression and development in wildlands.[6]
- When houses are built close to natural vegetation, they pose two problems related to wildfires. First, there will be more wildfires due to human ignitions. Second, wildfires that occur will pose a greater risk to lives and homes, and they will be hard to fight.[7]
- To stem the escalating loss of life and property, the state needs to curb development in high fire-hazard zones.[8]
- To stop the destruction of our communities by wildfire in our rapidly changing environment we must reduce the flammability of existing communities and prevent new ones from being built in very high fire hazard severity zones.[9]
- California's increasingly deadly and destructive wildfires have become so unpredictable that government officials should consider banning new home construction in vulnerable areas.[10]
- The best way to prevent wildfire destruction and death is to stop building houses in the path of fire.[11]

Based on overwhelming research and evidence concluding that people and structures near wildland areas are the primary driver of destructive wildfires, the Wildfire Committee sponsored a resolution, which Sierra Club California adopted last year. The Los Angeles County Democratic Party passed a similar resolution shortly thereafter. Both adopted new policies address the importance of restricting development in fire-prone areas:

- Sierra Club California: "supports policies that prohibit new building in Very High Fire Hazard Severity Zones, consistent with established Sierra Club infill policy, to respond to increasing intensity and frequency of devastating wildfires on lives, habitat, property, infrastructure, and the environment." (Adopted: August 22, 2020)
- The Los Angeles County Democratic Party: "calls on our state leaders to reconsider the approval of increased developments in Very High Fire Hazard Severity Zones near or in wildland-urban interface areas, and seeks strong regulations and limits on new structures, as these buildings have been found to increase the size and destructive nature of our state's worst fires." (Adopted: September 22, 2020)

Public opinion supports the recommendations of scientists and fire experts to restrict building in fire-prone areas. A 2019 Analysis of Quality of Life Index by UCLA's Luskin School of Public Affairs (see page 5, figure 8) found that 73 percent of those surveyed believe that the construction of new homes should be prohibited in high risk fire areas. Only 20 percent disagreed

We oppose this development in a VHFHSZ because it would put existing and future residents in harm's way in the event of a wind- driven wildfire. It would also endanger existing residents as they attempt to

evacuate on a residential street where many additional cars would add to an already difficult evacuation problem. ***The Draft EIR is deficient in failing to analyze the time required to evacuate and the project's potential to slow*** the ***evacuation of others in the community (with possible deadly results), creating an unacceptable risk to public safety.***

For all the reasons listed above, the Sierra Club Wildland Urban Wildfire Committee opposes further incursions into very high fire hazard severity zones, especially in areas that have limited evacuation routes and pose a serious danger to current and future residents. We also oppose such projects due to the rising costs associated with defending lives and property due to the increased occurrence of wildfires as temperatures rise creating drier and hotter conditions due to climate change.

Response 11-12:

Please see *Responses 11-1* to *11-11*, above. As stated above, the Project has been designed to meet all applicable County standards for development in a VHFHSZ, and the Draft EIR includes extensive analysis of the risk to the Project from wildfire and the ability to evacuate the Project site and surrounding community in the event required by a wildfire. Substantial evidence supports the Draft EIR's conclusion that the risk from wildfire is less than significant.

VAL VERDE CIVIC ASSOCIATION

VAL VERDE, CA | VVCIVIC@GMAIL.COM | WWW.VVCIVIC.COM | WWW.FACEBOOK.COM/VVCIVIC

12-20-2021

Jodie Sackett
County of Los Angeles
Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012
Tel: 213-974-6411
jsackett@planning.lacounty.gov

RE: Comment Period Extension Request for DEIR on Sterling Estates Planning Project No. 03-250-(5)

Dear Mr. Sackett,

The Val Verde Civic Association is the liaison between the community and government agencies and feels it is absolutely necessary to extend the current comment period for the Sterling Estates Planning Project No. 03-250-(5) Draft Environmental Impact Report. As per our bylaws, one of our purposes is to consider, review questions, and advise on projects of mutual interest and concern to Val Verde and the County.

The comment period from November 11th to January 9th has been an extremely inadequate timeline for residents, committees, and councils to properly review the 995 page document and return comments or take action on it. The time allotted to review and respond is heavily inundated by the holidays, holiday travel, and navigating the pandemic still affecting our community, which gives our residents much less time and ability for commenting or even reading the report. Likewise many government offices are closed and county and local advisory councils do not hold meetings for December.

12-1

Please consider how extremely difficult and inconsiderate the timing of this comment period is for our community and representatives. As it stands, the timing seems to intentionally limit public participation and leads to an inadequately examined project. In this case, it is a project which will permanently alter our community and is not to be skimmed over.

Please include this letter in the administrative record and provide a confirmation of your receipt of this correspondence.

Thank you for your time and consideration.

Sincerely,

The Val Verde Civic Association Board

Erica Larsen - President
Sarah Olaguez - Programs & Development Director
Kevan Smalley - Projects Director
Timothy Williams - Public Relations Director
Paula Coleman - Secretary

COMMENT LETTER NO. 12:

The Val Verde Civic Association Board
Erica Larsen – President
Sarah Olaguez - Programs and Development Director
Kevan Smalley - Projects Director
Timothy Williams - Public Relations Director
Paula Coleman - Secretary

Comment 12-1:

The Val Verde Civic Association is the liaison between the community and government agencies and feels it is absolutely necessary to extend the current comment period for the Sterling Estates Planning Project No. 03-250-(5) Draft Environmental Impact Report. As per our bylaws, one of our purposes is to consider, review questions, and advise on projects of mutual interest and concern to Val Verde and the County.

The comment period from November 11th to January 9th has been an extremely inadequate timeline for residents, committees, and councils to properly review the 995 page document and return comments or take action on it. The time allotted to review and respond is heavily inundated by the holidays, holiday travel, and navigating the pandemic still affecting our community, which gives our residents much less time and ability for commenting or even reading the report. Likewise, many government offices are closed and county and local advisory councils do not hold meetings for December.

Please consider how extremely difficult and inconsiderate the timing of this comment period is for our community and representatives. As it stands, the timing seems to intentionally limit public participation and leads to an inadequately examined project. In this case, it is a project which will permanently alter our community and is not to be skimmed over.

Please include this letter in the administrative record and provide a confirmation of your receipt of this correspondence.

Response 12-1:

CEQA requires a 45-day public review period, however, the County allowed a 60-day public review and comment period. The publication of the Draft EIR marked the beginning of the 60-day public review period during which written comments concerning the adequacy of the Draft EIR could be submitted by interested public agencies and members of the public. Public hearings were held before the Los Angeles County Hearing Examiner and Regional Planning Commission. The Hearing Examiner conducted a virtual (online) public hearing on Tuesday, December 14, 2021, to take testimony on the Draft EIR during the 60-day public review and comment period. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Joan Beuchel
10632 N Scottsdale Rd # 625
Scottsdale, AZ 85254-6164

December 1, 2021

Mr. Jodie Sackett- Planner
Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012
Tel: 213-974-6411
jsackett@planning.lacounty.gov

Re: Sterling Ranch Estates Project
TTM 60257, Case # 03-250
SCH Number: 2019080092
Castaic, CA

Dear Mr. Sackett

As a property owner in the Val Verde area for over 30 years, we support approval of the project referenced above.
In addition to providing much needed single-family housing to the area, the project will create two parks for the residents and community to enjoy.
We also support the proposed small commercial center which will allow residents to shop locally reducing traffic in the area.

Mr. Williams and his family have been put forth a long- term community outreach effort to ensure the project will fully mitigate all impacts to the Val Verde/Castaic areas. We are also happy to see the project is designed in accordance with the guidelines of Castaic Community Standards District and One Valley One Vision, which call for larger lots.

This project will provide many benefits to the current and future residents of the Val Verde, Castaic areas, and we look forward to the project being approved by LA County.

13-1

Should you have any questions, please feel free to contact me.

Sincerely,

Joan Beuchel

Joan Beuchel
Cc: Hunt Williams

COMMENT LETTER NO. 13:

Joan Beuchel
10632 N Scottsdale Rd # 625
Scottsdale, AZ 85254

Comment 13-1:

As a property owner in the Val Verde area for over 30 years, we support approval of the project reverenced above.

In addition to providing much needed single-family housing to the area, the project will create two parks for the residents and community to enjoy.

We also support the proposed small commercial center which will allow residents to shop locally reducing traffic in the area.

Mr. Williams and his family have been put forth a long-term community outreach effort to ensure the project will fully mitigate all impacts to the Val Verde/Castaic areas. We are also happy to see the project designed in accordance with the guidelines of the Castaic Community Standards District and One Valley One Vision, which call for larger lots.

This project will provide many benefits to current and future residents of the Val Verde, Castaic areas, and we look forward to the project being approved by LA County.

Response 13-1:

This comment expresses general support for the Project and cites some of the Project features. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration. This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no further response is necessary.

January 9, 2022

Jodie Sackett
County of Los Angeles
Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

VIA Electronic Mail: jsackett@planning.lacounty.gov

Subject: Response to Draft Environmental Impact Report for STERLING RANCH ESTATES
PROJECT NO. 03-250-(5)
VESTING TENTATIVE TRACT MAP NO. 060257
CONDITIONAL USE PERMIT NO. 03-250
OAK TREE PERMIT NO. 200700007
ENVIRONMENTAL ASSESSMENT NO. 03-250
STATE CLEARINGHOUSE NO. 2019080092

Dear Jodie Sacket,

As a long-standing private resident of the historical community of Val Verde Canyon, in the town of Castaic, I appreciate this opportunity to provide comments representing my family on the Draft Environmental Impact Report (DEIR) for the proposed project referenced above. However, I would like it noted for the record that I have directly contacted the Castaic Area Town Council and the Val Verde Civic Association to inquire if they were made aware of this hearing and commenting period. Both organizations responded that they had not been notified as of November 22, 2021, and the commenting period had already been opened. I live only a few hundred yards from one of the property lines for this project and also did not receive any form of notice ever. I personally find this unacceptable that Los Angeles County Regional Planning ignored notifying the local organizations representing this specific area of such an important process in a timely manner with a huge environmental and social impact in their area. **Holding a commenting period is meaningless (basically useless) when no one is aware of it.** My family and I found out what appears by accident, on top of it being during a major holiday season and a massive increase in the pandemic locally, nationally and internationally. The only form of notice are two signs strategically placed a good distance off the road with exceptionally low visibility to no visibility depending on the direction one is traveling. Since early Fall there has been major road construction going on changing out water pipes along that property adding to even more distraction and lack of visibility. Additionally, no one is seeing these signs while doing as recommended – staying home to avoid spreading Covid 19. Every single neighbor or resident we have spoken to had no notice or idea that anything was going on with the Sterling Ranch Estates project at all. There simply hasn't been time for the majority of the residents of the area to view this giant document of 995 pages to consider responding on something that will completely change the landscape of their home and their lifestyle forever.

14-1

In reaction to the Draft Environmental Impact Report [DEIR], which proposes a large new tract housing development in the small historic rural country style setting community of Val Verde Canyon, I am submitting comments to the DEIR, stating my family's opposition to this proposed

14-2

project as local long term property owners and residents. My comments will be limited, due to the short time frame explained above and the very large document, I will not be able to completely review it all on my own in time for the close of the commenting period. I will mainly be covering Table 1.0-1, Summary of Project Impacts. 14-2

I believe it is a disservice to this community, the rich history of this canyon, and the local environment including the delicate geology of the canyon itself which I find being heavily dismissed or downplayed in this EIR. Sterling Ranch Estates tract housing development does not assist in the desperate need in this state, county or valley for very low-income and low-income housing at all. I could probably understand this over urbanization in the wrong setting if it did. It would better match the current economic level of the area. These new homes will be saddled with HOA fees permanently and potentially Mello-roos for decades. If the tract homes were completed today, they would not list for a penny under $800,000. Sterling Ranch Estates tract homes will be sharing property lines with residents that have for over one hundred years lived a peaceful rural lifestyle in a country setting. 14-3

For the past 50 years the residents have had to endure living in the shadow of one of the largest landfills in this country (approximately another 30 years to go per their current CUP). Contrary to their favorite saying, they are NOT a good neighbor with 31 violation notices since 2018.

Per AQMD Inspector Larry Israel (information request response):
"Since 2018 there have been 31 Notice(s) of Violation served to Chiquita Canyon Landfill (Waste Connections) as follows:
2018 – 1 NOV for failing a Source Test
2019 – 3 NOVs for Rule 402 – Nuisance
2020 – 18 NOVs for Rule 402 – Nuisance
2021 – 9 NOVs for Rule 402 – Nuisance" 14-4

Now the Sterling Ranch Estates project is looking to add many more homes with many more people to share in the pollution put off by this landfill. Additionally, this document does not appear to address the extremely close proximity to active and inactive oil wells. State legislation backed by the current governor is looking to put a 3,200-foot public health setback between residents and oil wells (new homes / new wells buffer zone due to health hazards). This new housing track will be well under 3,200 feet from oil wells. (An Independent Scientific Assessment of Well Stimulation in California, Vol. 1 (SB4), Author(s): Long, Jane C.S.; Feinstein, Laura C.; Birkholzer, Jens T.; Jordan, Preston; Houseworth, James; Dobson, Patrick E.; Heberger, Matthew; Gautier, Donald L., Release Date: January 14, 2015 | Last Updated Date: July 22, 2016, https://ccst.us/reports/an-independent-scientific-assessment-of-well-stimulation-in-california-volume-1/) 14-5

Los Angeles County is cramming too many people, homes, buildings and businesses in their urban kingdom. When we are done destroying this planet grass will grow over the pavement and weeds will grow over the roofs. "Over urbanization will be the destruction of civilization." (Anonymous) 14-6

Please direct any questions regarding these comments, as well as appropriate responses, to me at abigaildesesa@sbcglobal.net. 14-7

Respectfully,

Abigail DeSesa & George Ordway

Private Residents of Val Verde Canyon

cc Kathryn Barger, 5th District Supervisor, Kathryn@bos.lacounty.gov
Stephanie English, Field Deputy to Supervisor Barger, SEnglish@bos.lacounty.gov
Castaic Area Town Council, castaictowncouncil@gmail.com
Val Verde Civic Association, vvcivic@gmail.com

DEIR: http://planning.lacounty.gov/assets/upl/case/03-250_deir.pdf

SECTION	COMMENT
1.0 EXECUTIVE SUMMARY, 4. a	Please explain why Alternative 1: No Project/No Development would not be safer for the existing community and more environmentally friendly than the other Alternative 2: Clustered Development—Smaller Lot Sizes, or Alternative 3: Mixed-Use Development Alternative?
1.0 EXECUTIVE SUMMARY, 5	Please explain how I will not be affected by the **"Areas of Controversy/Issue to Be Resolved"?** This section clearly lists many items that will directly negatively impact current resident's daily lives and property indefinitely. "Based on the scoping process, potential areas of controversy known to the County included aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire issues." These are major issues that do not at all compensate the current residents for their reduced safety, property value and way of life to name a few.
Table 1.0-1 Summary of Project Impacts, 5.1 Aesthetics, Threshold 5.1-1: Threshold 5.1-2: Threshold 5.1-4:	Please provide real life examples of a construction site that lasted for multiple years where it kept the natural environment aesthetics of a rural historical canyon intact? Many hiking trails have direct view to the proposed project site. Multiple established homes have direct view to the proposed project site. The project directly alters the view which will directly have large potential negative impact on neighboring property values. Please explain how this multiyear construction site will not have any negative impact on the neighboring property values due to Aesthetics?
Table 1.0-1 Summary of Project Impacts, 5.2 Air Quality, Threshold 5.2-1: Threshold 5.2-2: Threshold 5.2-3: Threshold 5.2-4:	Please list all the sources the additional water will come from that will be needed to meet the excessive watering required to try to minimize all the following while Los Angeles County is experiencing an extreme drought, yet again? Due to on going global warming these weather patterns are becoming more and more common. Please list the alternate levels of excessive exhaust fumes that will be added by the needed use of the additional watering trucks and sweeping trucks to meet the described below in the DEIR. Please list all the mitigation that will be needed for all the new people living in the stinky gasses of Chiquita Canyon Landfill noted in my opening letter listing all the Notices of Violation they have recently received. "MM 5.2-2: The Project Developer shall implement additional dust suppression measures during project construction, in the form of more frequent water dust suppression and other control measures that are beyond the SCAQMD Dust Control Plan requirements. The additional

	dust suppression measures shall be Less than Significant 1.0 Executive Summary County of Los Angeles 1.0-15 Sterling Ranch Estates Residential Project Draft Environmental Impact Report November 2021 Environmental Impacts Project Design Features & Mitigation Measures Level of Significance After Mitigation implemented prior to, during, and immediately following ground-disturbing activities and shall be incorporated into the SCAQMD's Dust Control Plan. These additional measures shall, at a minimum, include, the following: • Increased frequency of watering, above and beyond SCAQMD Dust Control Plan requirements, of on-site unpaved roads, off-site unpaved roads used for site access, and active construction areas if wind speeds exceed 25 mph or if temperatures exceed 95 degrees Fahrenheit for three consecutive days. The additional dust suppression shall continue until winds are 15 mph or lower and ambient air temperatures are below 90 degrees for at least two consecutive days; • Paved streets adjacent to the Project site shall be swept as needed to remove silt that may have accumulated from construction activities so as to prevent excessive amounts of dust; • All material excavated or graded shall be sufficiently watered to prevent excessive amounts of dust. Watering shall occur at least twice daily with complete coverage, preferably in the late morning and after work is done for the day; • All clearing, grading, earth-moving, or excavation activities shall cease during periods of high winds (i.e., greater than 25 miles per hour averaged over one hour) so as to prevent excessive amounts of dust; • All material transported n-site or ff-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust; • The area disturbed by clearing, grading, earth-moving, or excavation operations shall be minimized so as to prevent excessive amounts of dust; 1.0 Executive Summary County of Los Angeles 1.0-16 Sterling Ranch Estates Residential Project Draft Environmental Impact Report November 2021 Environmental Impacts Project Design Features & Mitigation Measures Level of Significance After Mitigation • All trucks hauling excavated or graded material on-site shall comply with State Vehicle Code Section 23114 regarding the prevention of such material spilling onto public streets by use of shed boards, truck covers, and other protective measures; and • A copy of the SCAQMD approved Dust Control Plan shall be submitted to the County of Los Angeles Department of Regional Planning prior to the issuance of construction related permits."
Table 1.0-1 Summary of Project Impacts, 5.3 Biological Resources Threshold 5.3-5:	Please explain how using one of the two options listed below that allow this project to remove 12 protected oak trees, benefits the immediate area the loss of these trees and the valuable resources they offer including oxygen production, wildlife homes and food source?

	"1. Purchase mitigation credits for 1.22 acres of oak woodlands from an off-site oak woodland habitat preservation area owned by a third party; or 2. Contribute to the Los Angeles County's Oak Forests Special Fund in an amount of $97,040 (two times the canopy cover area value)."
Table 1.0-1 Summary of Project Impacts, 5.4 Cultural Resources	Please explain how the County of Los Angeles is ignoring that Val Verde Canyon has a rich historical significance to the African American Community? It is a well document fact that Val Verde was the "Black Palm Springs" of the 1920s and 1930s. The area was established in 1924 per the LA Times. The DEIR only listed potential native American cultural impacts. The intersection of Highway 126 and Chiquito Canyon could not get a "temporary" signal light to help save lives without a full investigation and report for the potential for native American artifacts yet an entire new housing development does not have to conduct such an investigation?
Table 1.0-1 Summary of Project Impacts, 5.5 Energy	Please explain how the excessive use and need of trucks to water down the dust isn't a waste of unnecessary consumption of energy and resources (and water again while in a drought also creating more noise)? "Threshold 5.5-1: Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation,"
Table 1.0-1 Summary of Project Impacts, 5.6 Geology and Soils	Please explain how in an area well known for landslides is being listed as "No mitigation measures are required." ? Landslides have occurred throughout Val Verde Canyon the entire 22+ years I have lived here. Please view the large one at Chiquita Canyon Landfill, for example. Another one just happened about two weeks ago one lot over from our home which also is within a few hundred yards from one of the property boundaries for this project. "Threshold 5.6-3: Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?"
Table 1.0-1 Summary of Project Impacts, 5.7 Greenhouse Gas Emissions	Please explain how again "No mitigation measures are required." When there will be years and years of large construction trucks/vehicles polluting the local air with lots of exhaust fumes? "Threshold 5.7-1: Would the Project generate greenhouse gas (GHGs) emissions, either directly or indirectly, that may have a significant impact on the environment?"
Table 1.0-1	This is hands down one of the most critical sections and it shows the total disregard for human life in this EIR. Realistically this will

Summary of Project Impacts, 5.8 Hazards and Hazardous Materials	seriously be an area that jeopardizes the current resident's wellbeing and property. PLEASE explain how "No mitigation measures are required." when it comes to the blocking off our road ways when they too will be under construction and/or full of construction vehicles and delays? There is simply no way it couldn't impact emergency vehicles getting in and residents getting out in the event of an emergency. "Threshold 5.8-6: Would the Project Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?" AND "Threshold 5.8-7: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, because the project is located: i) within a high fire hazard area with inadequate access. ii) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. iii) within proximity to land uses that have the potential for dangerous fire hazard." Please be prepared for many lawsuits in the event anything like this does occur which is highly possible! With nearby oil wells, active and inactive, as well as high fire risk brush areas in the adjacent canyon to the project boundaries and the ongoing drought please explain how residents can be assured that they will not be at additional risk of loss due to this invasive project in this high fire risk area?
Table 1.0-1 Summary of Project Impacts, 5.9 Hydrology and Water Quality	Please explain how filling a large portion of ground surface with tar and cement won't interfere with recharging of ground water? Clearly water cannot permeate these surfaces leaving less area for water to seep into the ground to recharge ground water. "Threshold 5.9-2: Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?"
Table 1.0-1 Summary of Project Impacts, 5.10 Land Use and Planning	"Threshold 5.10-1: Would the Project physically divide an established community?" YES ! This creates in the middle of an existing lower income rural country community setting a completely different lifestyle and income level housing tract. This does separate part of the east side of Val Verde from the west side. To go from the west side of Val Verde to get to neighbors on the east side or Hasley Canyon Road, where services are located, you would have to drive through this new housing development. Please explain how having two large differences in lifestyles and income levels surrounding one another is not physically dividing an established community? One community will have strict HOA rules while the other has rural community standards. HOA people will be complaining regularly about the already existing residents and how they live their lives. AND "Threshold 5.10-3: Would the Project conflict with the goals and policies of the General

	Plan related to Hillside Management Areas or Significant Ecological Areas?" This section absolutely does not stick to the CSD (Community Standards District) designated for the "rural" community and removes levels of hillside specifically stated NOT allowed in the CSDs. Please explain where it states in the current CSDs that Val Verde is not rural and it is okay to remove the hillsides/ridgelines?
Table 1.0-1 Summary of Project Impacts, 5.11 Noise	"Threshold 5.11-1: Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?" The noise levels will make a huge impact on the local residents daily for years! The mitigation will never be able to create the quite rural setting it is today. Please explain how this project intends to mitigate the noise for our many first responders who work graveyard and must sleep during the day? "Implement noise complaint reporting. A sign, legible at a distance of 50 feet, shall be posted at the Project construction site, providing a contact name and a telephone number through which residents can inquire about the construction process and register complaints. This sign shall indicate the dates and duration of construction activities. In conjunction with this required posting, a noise disturbance coordinator shall be identified to address construction noise concerns received. The contact name and the telephone number for the noise disturbance coordinator shall be posted on the sign. The coordinator shall be responsible for responding to any local complaints about construction noise and shall notify the County Department of Public Works to determine the cause and implement reasonable measures to the complaint, as deemed acceptable by the County Department of Public Works." PLEASE explain what could possibly be done when the complaints come in that the noise is disturbing daily life for the current residents? There is NOTHING that can be done if the project is to continue to be developed. This is unbelievably invasive and it will be for years. It will also lower all immediate home values due to the excessive noise, traffic delays, dust and overall unsightly views.
Table 1.0-1 Summary of Project Impacts, 5.12 Population and Housing	"Threshold 5.12-1 : Would the Project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?" AND "Threshold 5.12-2: Would the Project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?" Please explain how this won't cause a substantial number of people needing to MOVE AWAY due to this entire project? With a large influx of people due to ALL of the new developments our infrastructure cannot handle it.

	Please explain how an already over taxed infrastructure will support ALL the new developments including this one? Currently, we experience extended traffic delays on all our local highways and freeways. Many current people will need to try to find somewhere else to live due to the excessive noise, dust, pollution, additional traffic delays, and the expected loss of home value during the construction of this project. We are being pushed from our homes and way of life to make room for those who do not live here and want a different style life than "rural" which is what this area is designated as. This major development in this historical tight knit community absolutely will cause major disruptions in everyone's lives for years and will forever have destroyed the viewshed and environment that they invested in to live here.
Table 1.0-1 Summary of Project Impacts, 5.13 Public Services	"Threshold 5.13.2-1: Would the Project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities in order to maintain acceptable service ratios, response times or other performance objectives Sheriff protection services." Val Verde already has an extremely long wait time response from the Sheriff. Please explain how lighting and low bushes will at all help in response times from the same number of Sheriff while now trying to service 222 more homes in Val Verde? "Threshold 5.13.4-1: Would the Project create capacity or service levels problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or physically altered government facilities in order to maintain acceptable service ratios, response times, or other performance objectives for schools:" Please explain why there is not a single comment under how to mitigation this section? Our schools/classrooms are already crowded and there is a much larger development less than half a mile away with 497 new homes that will be using these same lower grade and middle schools too. This development does not include any schools.
Table 1.0-1 Summary of Project Impacts, 5.14 Recreation	Please explain why the "private" hiking trails is not listed here? Private trails that will divide the current residents from the new ones causing more of the "haves and the have nots" in this community. This adds to highlighting and dividing this community with obvious socio economic difference.
Table 1.0-1 Summary of Project Impacts, 5.15 Transportation	"Threshold 5.15-1 : Would the Project conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?" AND "Threshold 5.15-4: Would the Project result in inadequate emergency access?" Please explain how the current residents will be compensated for all

	their lost time due to the excessive traffic delays that this project of multiple years will create for them? Please explain what insurance plans are going to be in place for the lawsuits when emergency vehicles are delayed getting to a current resident? Please explain how the residents nearby will be given notice of all these specific delays? Currently, the notification for this EIR was not shared with the residents nearby, we are just one of many nearby not notified. We do not believe the current system is working and would like to know what new notification system will be implemented?
Table 1.0-1 Summary of Project Impacts, 5.16 Tribal Cultural Resources	Please explain why no other Native American group other than Fernandeno Tataviam Band of Mission Indians is being contacted to confirm their interest in this land?
Table 1.0-1 Summary of Project Impacts, 5.17 Utilities and Service Systems	"Threshold 5.17.1-2: Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?" Please explain why water is not a concern for 222 MORE homes when the current homes are requested to cut back on their water use and have been asked for years to do so? "Threshold 5.17.2-1: Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?" AND "Threshold 5.17.4 : Would the Project require or result in the relocation or construction of new or expanded electric power, natural gas or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?" Please explain the compensation to the current residents when utilities like electricity will have to be shut off while the new homes are being added in to the system? Will there be a well-advertised reporting program for claims for the damages like spoiled food from refrigerators being off?
TABLE 1.0-1 SUMMARY OF PROJECT IMPACTS, **5.18 Wildfire**	Please explain how adding 222 homes full of people and cars will not impact evacuating Val Verde, a designated HIGH fire risk area per every insurance company and the state of California? Please explain how needing more firebreak roads to help protect the new homes won't experience water run off or landslides after a wildfire? Please explain how DURING construction the current residents will not be more at risk trying to evacuate on roads that are under construction and have detours? "Threshold 5.18-1: Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?" AND "Threshold 5.18 -2: Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the

	uncontrolled spread of a wildfire?" AND "Threshold 5.18-3 : Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?" AND "Threshold 5.18 -4: Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?" AND "Threshold 5.18 -5: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?"

COMMENT LETTER NO. 14:

Abigail DeSesa and George Ordway

Comment 14-1:

As a long-standing private resident of the historical community of Val Verde Canyon, in the town of Castaic, I appreciate this opportunity to provide comments representing my family on the Draft Environmental Impact Report (Draft EIR) for the proposed project referenced above. However, I would like it noted for the record that I have directly contacted the Castaic Area Town Council and the Val Verde Civic Association to inquire if they were made aware of this hearing and commenting period. Both organizations responded that they had not been notified as of November 22, 2021, and the commenting period had already been opened. I live only a few hundred yards from one of the property lines for this project and also did not receive any form of notice ever. I personally find this unacceptable that Los Angeles County Regional Planning ignored notifying the local organizations representing this specific area of such an important process in a timely manner with a huge environmental and social impact in their area. **Holding a commenting period is meaningless (basically useless) when no one is aware of it.** My family and I found out what appears by accident, on top of it being during a major holiday season and a massive increase in the pandemic locally, nationally and internationally. The only form of notice are two signs strategically placed a good distance off the road with exceptionally low visibility to no visibility depending on the direction one is traveling. Since early Fall there has been major road construction going on changing out water pipes along that property adding to even more distraction and lack of visibility. Additionally, no one is seeing these signs while doing as recommended – staying home to avoid spreading Covid 19. Every single neighbor or resident we have spoken to had no notice or idea that anything was going on with the Sterling Ranch Estates project at all. There simply hasn't been time for the majority of the residents of the area to view this giant document of 995 pages to consider responding on something that will completely change the landscape of their home and their lifestyle forever.

Response 14-1:

Please refer to *Response 12-1* regarding the comment period. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration. This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no further response is necessary.

Comment 14-2:

In reaction to the Draft Environmental Impact Report [Draft EIR], which proposes a large new tract housing development in the small historic rural country style setting community of Val Verde Canyon, I am submitting comments to the Draft EIR, stating my family's opposition to this proposed project as local long term property owners and residents. My comments will be limited, due to the short time frame explained above and the very large document, I will not be able to completely review it all on my own in time for the close of the commenting period. I will mainly be covering Table 1.0-1, Summary of Project Impacts.

Response 14-2:

The comment is noted for the record and will be forwarded to the decision-makers for review and consideration. This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no response is necessary.

Comment 14-3:

I believe it is a disservice to this community, the rich history of this canyon, and the local environment including the delicate geology of the canyon itself which I find being heavily dismissed or downplayed in this EIR. Sterling Ranch Estates tract housing development does not assist in the desperate need in this state, county or valley for very low-income and low income housing at all. I could probably understand this over urbanization in the wrong setting if it did. It would better match the current economic level of the area. These new homes will be saddled with HOA fees permanently and potentially Mello-Roos for decades. If the tract homes were completed today, they would not list for a penny under $800,000. Sterling Ranch Estates tract homes will be sharing property lines with residents that have for over one hundred years lived a peaceful rural lifestyle in a country setting.

Response 14-3:

As discussed in Section 5.6: Geology and Soils of the Draft EIR, the Project has been designed to be consistent with Los Angeles County's pre-2015 Hillside Management Area Ordinance through some sensitive hillside design techniques, such as contour grading, retention of natural vegetation, and undulating slopes, to ensure that development in hillside areas maintains the natural topography, resources, and amenities of these areas. Implementation of the required Geotechnical Study and final grading, drainage, and erosion control plans, and compliance with County Building Code and County regulations, would mitigate all potential construction and operation impacts related to geology and soils to less than significant, including indirect risks to life or property on the Project due to substantial soil erosion or the loss of topsoil, unstable geologic units, or expansive soil. Impacts related to geotechnical hazards including strong seismic ground shaking, seismic ground failure, including liquefaction and lateral spreading, and landslides would be less than significant with compliance with recommendations in the Geotechnical Study and the County Building Code.

As discussed in Section 5.10: Land Use and Planning of the Draft EIR, the VTTM site and the Off-Site Roadway Improvement Area have an "urban" designation of H2–Residential 2 and H5–Residential 5 under the 2012 Santa Clarita Valley Area Plan (SCVAP 2012) which is a component of the County's General Plan, allowing single-family residential uses with a maximum of either two dwelling units per acre or five dwelling units per acre, respectively. The commercial component of the VTTM site, designated CG–General Commercial, provides for commercial uses serving the local community such as restaurants and retail. The Off-Site Sewer Line Improvement Area, the Off-Site Open Space Dedication Area, and the Off-Site Water Tank Area are designated as R5–Rural Land 5, R2, and R20, respectively, which allow for low-density

residential uses on large lots, equestrian and limited animal, and agricultural uses. The Off-Site Water Line Improvement area is designated as H2.

The Los Angeles County Zoning Ordinance (Title 22 of the Los Angeles County Code) regulates development through land use designations and development standards. The VTTM site is zoned as R-1–Single Family Residence and C-2–Neighborhood Commercial. The Off-Site Roadway Improvement Area is zoned R-1. The Off-Site Open Space Dedication Area is zoned as A-2-2 and A-2-5, Light and Heavy Agricultural uses, respectively. The Off-Site Water Line Improvement Area and the Off-Site Sewer Line Improvement Area are located within the roadway right-of-way and surrounded by R-1, A-2-2, and Residential Planned Development (RPD)-5000-2.8U. The Off-Site Water Tank Area is zoned A-2-2. The Project is consistent with current zoning.

The Project site is located within Area 4, the Val Verde Area, of the Castaic Area Community Standards District (CSD). The Southern California Association of Governments (SCAG), the agency which is the federally recognized Metropolitan Planning Organization (MPO) for the Southern California region, identifies the existing General Plan land use designations as "Single Family Residential" and "Commercial and Services." The Castaic Area Community Standard District (Castaic Area CSD) was approved by the Los Angeles County Board of Supervisors in December of 2004 and is part of the County Planning and Zoning Code applicable to the Project, codified as Los Angeles County Code Section 22.44.137. The Castaic Area CSD defines the Castaic area of influence within Los Angeles County and describes the development standards that manage the growth of the Castaic community. The purpose of the Castaic Area CSD is to ensure new development will be compatible with the Castaic area's existing character, identifying and requiring certain design requirements, including preservation of significant ridgelines and trail development, minimum lot sizes greater than 7,000 sq. ft. for new development, and average lot sizes of at least 10,000 sq. ft. for a new subdivision. The goals and policies of the Castaic Area CSD that are applicable to the Project and an analysis of the Project's consistency with these goals and policies are provided in Table 5.10-3: Castaic Area Community Standards District Project Consistency Analysis of the Draft EIR.

The Project would provide 222 residential lots, which is fewer than the 253 maximum residential lots permitted under the Santa Clarita Valley Area Plan: One Valley One Vision (SCAVAP) 2012, and for lots greater than 7,000 sq. ft., approximately 41 percent would have an average lot size of 11,634 sq. ft., consistent with the Castaic Area CSD standards for lot sizes. The Project would provide the minimum lot setbacks under Los Angeles County Zoning Ordinance and would maintain the height of both residential and commercial structures to below 35 feet above-grade. The Project would provide two private recreation lots consistent with the Castaic Area CSD available to the public and would provide supporting off-site improvements consistent with County Code. The Project is consistent with development standards,

goals, objectives, and policies of the Los Angeles County General Plan, SCVAP 2012, Los Angeles County Code, and Castaic Area CSD.

As discussed in Section 5.12: Population and Housing of the Draft EIR, the Project would include the development of 222 single-family homes consistent with existing land use and zoning designations. The Project would result in an increase of 686 persons and nine employment opportunities to the greater Santa Clarita Valley area. The population, housing, and employment growth assumptions were considered in the regional projections. The Project would represent approximately 1.6, 5.5, and 0.08 percent of SCAG 2040 projections for population, housing, and employment, respectively. Such levels of growth are consistent with the population forecasts for the subregion as adopted by SCAG. The Project is also consistent with the types, intensity, and patterns of land use envisioned for this region.

The Project as described and analyzed in the Draft EIR is the proposed subdivision of the site to create 222 single-family lots consistent with existing land use and zoning designations. No homes have been designed at this time and no information is available regarding the likely prices of homes that would be developed on proposed residential lots. Further, the prices of the homes that could be developed on proposed residential lots is an economic, and not an environmental, matter. Per Section 15131(A), the economic or social effects of a project will not be treated as significant effects on the environment.

Comment 14-4:

For the past 50 years the residents have had to endure living in the shadow of one of the largest landfills in this country (approximately another 30 years to go per their current CUP). Contrary to their favorite saying, they are NOT a good neighbor with 31 violation notices since 2018.

> Per AQMD Inspector Larry Israel (information request response):
> "Since 2018 there have been 31 Notice(s) of Violation served to Chiquita Canyon Landfill (Waste Connections) as follows:
> 2018 – 1 NOV for failing a Source Test
> 2019 – 3 NOVs for Rule 402 – Nuisance
> 2020 – 18 NOVs for Rule 402 – Nuisance
> 2021 – 9 NOVs for Rule 402 – Nuisance"

Now the Sterling Ranch Estates project is looking to add many more homes with many more people to share in the pollution put off by this landfill.

Response 14-4:

Please refer to *Response 9-3* regarding the Chiquita Canyon Landfill.

Comment 14-5:

Additionally, this document does not appear to address the extremely close proximity to active and inactive oil wells. State legislation backed by the current governor is looking to put a 3,200-foot public health setback between residents and oil wells (new homes / new wells buffer zone due to health hazards). This new housing track will be well under 3,200 feet from oil wells. (An Independent Scientific Assessment of Well Stimulation in California, Vol. 1 (SB4), Author(s): Long, Jane C.S.; Feinstein, Laura C.; Birkholzer, Jens T.; Jordan, Preston; Houseworth, James; Dobson, Patrick E.; Heberger, Matthew; Gautier, Donald L., Release Date: January 14, 2015 | Last Updated Date: July 22, 2016, https://ccst.us/reports/an-independent-scientific-assessment-of-well-stimulationin-california-volume-1/).

Response 14-5:

Los Angeles County Code Section 22.140.400(C)(3), Setback From Residences, indicates that oil drilling shall not be located within 300 feet of any residence, except for a residence on the same land that is owned or leased by the person drilling the oil well. Additionally, Section 22.140.400(C)(4), Additional Standards for Setbacks Less Than 500 Feet From Residences, drilling within 500 feet of one or more residences is prohibited, except for a residence on the same land that is owned or leased by the person drilling the oil well.

The Department of Conservation, Geologic Energy Management Division has proposed a draft rule that would create a setback exclusion area and a setback mitigation area of all land within 3,200 feet of a sensitive receptor.[27] A sensitive receptor is defined as any residence including private homes, condominiums, apartments, and living quarters; education resources such as preschools and kindergarten through grade twelve (K-12) schools; daycare centers; any building housing a business that is open to the public; and health care facilities such as hospitals or retirement and nursing homes. A sensitive receptor includes long-term care hospitals, hospices, prisons, and dormitories or similar live-in housing. The proposed rule would not allow for the approval of a Notice of Intention to drill a new well with a new surface location within the setback exclusion area, with the exception of a well, such as an intercept well or a pressure relief well, that must be drilled to alleviate an immediate threat to public health and safety or the environment. New production would be limited within the setback exclusion area. The setback mitigation area would be subject to the implementation of a Leak Detection and Response Plan to existing facilities.

27 California Department of Conservation, Geologic Energy Management Division, Public Health Rulemaking, Draft Rule for the Protection of Communities and Workers from Health and Safety Impacts from Oil and Natural Gas Production Operations, Pre-Rulemaking Release for Public Review and Consultation, accessed at https://www.conservation.ca.gov/calgem/Documents/public-health/PHRM%20Draft%20Rule.pdf.

The draft rule has been released for public review and consultation which closed on December 21, 2021. As of February 15, 2022 the draft rule has not been adopted.[28]

Please refer to *Response 6-4*, regarding the abandoned oil well. As analyzed in Section 5.8: Hazards and Hazardous Materials of the Draft EIR, an abandoned oil well is present within the northwest portion of the VTTM site, within a proposed debris basin. This former oil well was previously a part of the Halsey Canyon Oil Field and was installed to a depth of approximately 3,600 feet in 1920. From records obtained from the Division of Oil, Gas, and Geothermal Resources (DOGGR) now known as the California Geologic Energy Management Division (CalGEM), this abandoned oil well was identified as Fernando Oil Well Company No. 1. This oil well was abandoned in 1923. The former oil well is considered a historical recognized environmental condition (HREC). Several of the proposed residential lots would be within 300 feet of the former oil well, which would be remediated and re-abandoned in accordance with current CalGEM requirements and County requirements. A methane report would be required prior to the issuance of building permits in accordance with Los Angeles Building Code Section 110.4, and would identify site-specific gas protection system requirements, general construction requirements, gas mitigation requirements, monitoring requirements, and submittal requirements. Therefore, impacts during subsurface excavation, as well as potential methane gas impacts from the remediated and re-abandoned oil well, would be less than significant.

Comment 14-6:

Los Angeles County is cramming too many people, homes, buildings and businesses in their urban kingdom. When we are done destroying this planet grass will grow over the pavement and weeds will grow over the roofs. “Over urbanization will be the destruction of civilization.” (Anonymous)

Response 14-6:

Please refer to *Response 14-3*. The Project is consistent with development standards, goals, objectives, and policies of the Los Angeles County General Plan, SCVAP 2012, Los Angeles County Code, and Castaic Area CSD. Additionally, the Project would provide 222 residential lots, which is fewer than the 253 maximum residential lots permitted. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration. This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no response is necessary.

28 California Department of Conservation, Geologic Energy Management Division, Public Health Rulemaking, Updated February 15, 2022, accessed at https://www.conservation.ca.gov/calgem/Pages/Public-Health.aspx.

Comment 14-7:

Please direct any questions regarding these comments, as well as appropriate responses, to me at abigaildesesa@sbcglobal.net.

Response 14-7:

The comment is noted for the record and will be forwarded to the decision-makers for review and consideration. This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no further response is necessary.

January 26, 2022

Jodie Sackett
County of Los Angeles
Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

VIA Electronic Mail: jsackett@planning.lacounty.gov

Subject: Response to Draft Environmental Impact Report for STERLING RANCH ESTATES
PROJECT NO. 03-250-(5)
VESTING TENTATIVE TRACT MAP NO. 060257
CONDITIONAL USE PERMIT NO. 03-250
OAK TREE PERMIT NO. 200700007
ENVIRONMENTAL ASSESSMENT NO. 03-250
STATE CLEARINGHOUSE NO. 2019080092

Dear Jodie Sacket,

I am taking this short extension period for this specific noted DEIR above to add a few additional comments and concerns to my letter dated January 9, 2021. Again, I would like to stress I am not representing anyone other than myself and my immediate family that resides here, and has for 23 years. Additionally, I am still not able to go through this entire massive document therefore I will be as specific as possible with the limited reading I have been able to do. 15-1

I believe the naturally occurring yet highly sped up global warming issues are not being seriously address with this new development of 222 homes. To start with, I have not been able to locate the requirement that each of these new homes will have solar that can produce a minimum average of electricity the new residents will be needing. This DEIR does not appear to meet what I understand is referred to as a "Net Zero" greenhouse design. With Los Angeles County being one of the highest densely populated Counties in this state, how can any new development even be considered without addressing this very real issue? California needs to do everything it can to reach a 40-percent reduction of 1990 level emissions by 2030, per the Climate Insurance Working Group, Draft Climate Insurance Recommendation of 2021. It is part of the settlement for the Tejon Ranch Project to install solar on all roof tops. Why is Los Angeles County even considering a project without what has become an industry minimum standard for new developments both residential and commercial? This is a significant concern. 15-2

It is a well-known fact that Val Verde Canyon, the location of this new development of 222 homes, is in a Very High Fire Hazard Severity Zone (VHFHSZ). Why aren't there required underground electrical wires to prevent more wildfires? Are there required ember-resistant roof vents, closed eaves, and exterior sprinklers including emergency rooftop systems? The DEIR has conducted biological surveys during extreme drought years only (May 2017 and July 2017 then May 2020, June 2020, July 2020, and August 2020) and should be required to survey following a non-drought year to furnish more accurate data. It will provide more accurate data for the VHFHSZ. This is a significant concern. 15-3

This DEIR also falls short of providing enough biological surveys of impact on wildlife and their habitat having only conducted surveys during the extreme drought years and should conduct additional surveys this spring and summer following the December 2021's rains. This should include, but not limited to, attention to the "special concern" species (sensitive status) of the western spadefoot toad (Spea hammondii) which is known to live close to this area. From the maps provided and others researched, it appears that this project creates a bottleneck for wildlife by blocking a natural wildlife corridor and may cause even less ability for our wildlife to maintain the genetic diversity needed. This is exasperated by the already approved expansion of the Chiquita Canyon Landfill and the Newhall Ranch development. This applies to the unique and rare low shrub and grassland habitat termed "Palmer's goldenbush (Ericameria palmeri) scrub alliance" located in this area too. Proper mitigation of it does not appear to be taken into consideration in the DEIR. This is a significant concern. 15-4

Val Verde Canyon, per the CSDs for this designated area, states it as a "rural" area. Seeing everything is done online these days, www.dictionary.com defines the word "rural" as follows:
"Adjective:

1. of, relating to, or characteristic of the country, country life, or country people; rustic: rural tranquility.
2. living in the country: the rural population.
3. of or relating to agriculture: rural economy."

A brand new 222 HOA tract housing development cluster does not remotely fit that definition. The Project does not adhere to the CSDs of this community. This is a significant concern. 15-5

I respectfully request that any future signage and notices regarding this Project or any other project in Val Verde Canyon be printed in both English and Spanish. Val Verde Canyon is heavily populated by Spanish speaking people. Citizens of this community have the right to know what is happening in their own community. This is a significant concern. 15-6

Please direct any questions regarding these comments, as well as appropriate responses, to me at abigaildesesa@sbcglobal.net. 15-7

Respectfully,

Abigail DeSesa & George Ordway

Private Residents of Val Verde Canyon

cc Kathryn Barger, 5th District Supervisor, Kathryn@bos.lacounty.gov
Stephanie English, Field Deputy to Supervisor Barger, SEnglish@bos.lacounty.gov
Castaic Area Town Council, castaictowncouncil@gmail.com
Val Verde Civic Association, vvcivic@gmail.com

COMMENT LETTER NO. 15:

Abigail DeSesa and George Ordway

Comment 15-1:

I am taking this short extension period for this specific noted Draft EIR above to add a few additional comments and concerns to my letter dated January 9, 2021. Again, I would like to stress I am not representing anyone other than myself and my immediate family that resides here, and has for 23 years. Additionally, I am still not able to go through this entire massive document therefore I will be as specific as possible with the limited reading I have been able to do.

Response 15-1:

Please refer to *Response 12-1* regarding the comment period. This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no further response is necessary.

Comment 15-2:

I believe the naturally occurring yet highly sped up global warming issues are not being seriously address with this new development of 222 homes. To start with, I have not been able to locate the requirement that each of these new homes will have solar that can produce a minimum average of electricity the new residents will be needing. This Draft EIR does not appear to meet what I understand is referred to as a "Net Zero" greenhouse design. With Los Angeles County being one of the highest densely populated Counties in this state, how can any new development even be considered without addressing this very real issue? California needs to do everything it can to reach a 40-percent reduction of 1990 level emissions by 2030, per the Climate Insurance Working Group, Draft Climate Insurance Recommendation of 2021. It is part of the settlement for the Tejon Ranch Project to install solar on all roof tops. Why is Los Angeles County even considering a project without what has become an industry minimum standard for new developments both residential and commercial? This is a significant concern.

Response 15-2:

Please refer to *Response 2-6* regarding greenhouse gas emissions. The Draft EIR analyzed the greenhouse gas emissions that would be generated by construction and operation of the Project in Section 5.7: Greenhouse Gas Emissions. The Project would adhere to zoning requirements regarding installation of electric vehicle (EV) charging stations. The proposed commercial uses would be required to provide EV charging facilities per CALGreen requirements, and all residential units would have solar and the capability for EV charging. The Project would comply with Title 24 and the energy efficiency measures in the County's Green Building Ordinance, which require the Project's residential buildings to install solar photovoltaic (PV) systems, residential buildings to have the capability for EV charging, and the installation of EV charging stations for the commercial use. The Project would also include energy-efficient appliances per the 2019 California Building Standards Code. Based on the information and analysis in the Draft EIR, the Project greenhouse gas emission impacts would be less than significant.

Comment 15-3:

It is a well-known fact that Val Verde Canyon, the location of this new development of 222 homes, is in a Very High Fire Hazard Severity Zone (VHFHSZ). Why aren't there required underground electrical wires to prevent more wildfires? Are there required ember-resistant roof vents, closed eaves, and exterior sprinklers including emergency rooftop systems? The Draft EIR has conducted biological surveys during extreme drought years only (May 2017 and July 2017 then May 2020, June 2020, July 2020, and August 2020) and should be required to survey following a non-drought year to furnish more accurate data. It will provide more accurate data for the VHFHSZ. This is a significant concern.

Response 15-3:

Wildfire impacts are evaluated in Section 5.8: Hazards and Hazardous Materials and in Section 5.18: Wildfire in the Draft EIR. Based on the information and analysis in the Fire Behavior Analysis and Report, included as Appendix P to the Draft EIR, the Project would comply with all proposed State and County requirements related to land management within a Very High Fire Hazard Severity Zone, including an approved Fuel Modification Plan. Project construction would be in compliance with applicable CBSC and CFC regulations that would ensure that appropriate measures, including fire prevention and fuel modification features, are provided, so that urban development would not expose Project occupants to increased and uncontrolled wildfire hazards. The Project would meet fire hardening requirements for projects located in a Very High Fire Hazard Severity Zone, including Chapter 7A of the California Building Code, Chapter 49 of the California Fire Code, and Section R337 of the California Residential Code as adopted and amended by the County of Los Angeles. The Project would construct a one-million-gallon water tank in the Off-Site Water Tank Area. The water tank would be sized to accommodate the Project and additional fire-fighting capacity in the surrounding Val Verde community, in accordance with Los Angeles County Waterworks District No. 36 requirements. The Fire Behavior Analysis and Report indicates that only limited fire resources would be required to protect the Project site due to radiant heat mitigations, ember resistance and limited use of combustible materials on the exterior of the structures, wide streets, good water supply, and defensible space around the structures.

Please refer to *Response 6-7* regarding biological surveys. As described in the Biological Technical Report for the Sterling Ranch Estates Residential Project contained in Appendix C of the Draft EIR, surveys were conducted in 2016, 2017, 2018, and 2020. These surveys, which were conducted over a four-year period and included approximately 250 person hours by qualified and experienced biologists, sufficiently and properly characterized the vegetation communities present on the Project site and considered drought effects.

Comment 15-4:

This Draft EIR also falls short of providing enough biological surveys of impact on wildlife and their habitat having only conducted surveys during the extreme drought years and should conduct additional surveys

this spring and summer following the December 2021's rains. This should include, but not limited to, attention to the "special concern" species (sensitive status) of the western spadefoot toad (Spea hammondii) which is known to live close to this area. From the maps provided and others researched, it appears that this project creates a bottleneck for wildlife by blocking a natural wildlife corridor and may cause even less ability for our wildlife to maintain the genetic diversity needed. This is exasperated by the already approved expansion of the Chiquita Canyon Landfill and the Newhall Ranch development. This applies to the unique and rare low shrub and grassland habitat termed "Palmer's goldenbush (Ericameria palmeri) scrub alliance" located in this area too. Proper mitigation of it does not appear to be taken into consideration in the Draft EIR. This is a significant concern.

Response 15-4:

Please refer to *Response 6-7* regarding biological surveys. As described in the Biological Technical Report for the Sterling Ranch Estates Residential Project contained in Appendix C of the Draft EIR, surveys were conducted in 2016, 2017, 2018, and 2020. These surveys, which were conducted over a four-year period and included approximately 250 person hours by qualified and experienced biologists, sufficiently and properly characterized the vegetation communities present on the Project site and considered drought effects.

Comment 15-5:

Val Verde Canyon, per the CSDs for this designated area, states it as a "rural" area. Seeing everything is done online these days, www.dictionary.com defines the word "rural" as follows:

"Adjective:

1. of, relating to, or characteristic of the country, country life, or country people; rustic: rural tranquility.
2. living in the country: the rural population.
3. of or relating to agriculture: rural economy."

A brand new 222 HOA tract housing development cluster does not remotely fit that definition. The Project does not adhere to the CSDs of this community. This is a significant concern.

Response 15-5:

Please refer to *Response 14-3* regarding land use.

Comment 15-6:

I respectfully request that any future signage and notices regarding this Project or any other project in Val Verde Canyon be printed in both English and Spanish. Val Verde Canyon is heavily populated by Spanish speaking people. Citizens of this community have the right to know what is happening in their own community. This is a significant concern.

Response 15-6:

All notices related to the Project have been, and will be, provided in accordance with County standards and the CEQA Guidelines. This comment is noted for the record and will be forwarded to the decision-makers for review and comment.

Comment 15-7:

Please direct any questions regarding these comments, as well as appropriate responses, to me at abigaildesesa@sbcglobal.net.

Response 15-7:

This comment indicates where to contact the commenter. This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no further response is necessary.

January 9, 2022

Jodie Sackett
County of Los Angeles
Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

VIA electronic mail: jsackett@planning.lacounty.gov

Subject: Response to Draft Environmental Impact Report for STERLING RANCH ESTATES

PROJECT NO. 03-250-(5)
VESTING TENATIVE TRACT MAP NO. 060257
CONDITIONAL USE PERMIT NO. 03-250
OAK TREE PERMIT NO. 200700007
ENVIRONMENTAL ASSESSMENT NO. 03-250
STATE CLEARING HOUSE NO. 2019080092

Dear Jodie Sackett,

I am a long time resident of Los Angeles County, born and raised. I have watched the San Fernando Valley "grow" and the Santa Clarita Valley "grow". It has become a very densely populated county and outrageously priced.

I am watching my little piece of rural living being taken away by builders who are only in it for the money they can gain from building outrageously priced homes on postage stamp lots with no concern for the infrastructure that must be in place to support these homes that no one I know of can afford. (I understand the price of these homes will be over $800,000. That is not affordable). I also understand that the reason there was a new water pipe installed from Hasley Canyon into the edge of Val Verde is because of the necessity to satisfy water connections for this project, Sterling Ranch Estates. 16-1

Again, LA County is disrespecting this historical town and ignoring the lives of the residents. Between the lack of consideration for our health, with the expansion of the dump that continually violates the CUPs they have been given, the lack of maintenance on our roads, lack of safe egress to the south from the center of town (still waiting for the "temporary" signal at highway 126 and Chiquito Canyon Road), the lack of updated utilities and the lack of notification of everything that affects this town (oil wells, road closures, pot holes, the creation of a "have versus the have nots" atmosphere and excavating for dead bodies).

This project says it will put in a newly aligned road. Great, but what happens when that new road connects to Chiquito Canyon Road (only one lane in each direction) in Val Verde? That intersection will become a hazard for those living in this area and those "new" residents in in Hasley Canyon who will discover this "shortcut" from Castaic to the 126. 16-2

I have been asked to restrict my water consumption, but you want to build over 20,000 homes within 5 miles of my house. The location of the water tank for this project is 3-5 miles further into Val Verde. Who is benefitting from these housing tracts? The builders and LA County, that's who. Do you not know about the underground river flowing north to south through Val Verde? 16-3

The process for this project was horribly advertised. I have read a major portion of the 900+ pages of the EIR and I am shocked to see how many of the tables are slated as "less than significant". "This Draft EIR focuses on changes to the environment that would result from implementation of the Project, individually and cumulatively with other development projects. This Draft EIR identifies potentially significant direct and indirect impacts resulting from construction and operation of the Project and identifies mitigation measures to reduce or avoid such effects. Based on the review of environmental issues by the County, this Draft EIR analyzes the following environmental topics: 2.0 Introduction County of Los Angeles 2.0-3 Sterling Ranch Estates Residential Project Draft Environmental Impact Report 16-4

November 2021 • Aesthetics • Air Quality • Biological Resources • Cultural Resources • Energy • Geology and Soils • Greenhouse Gas Emissions • Hazards and Hazardous Materials • Hydrology and Water Quality • Land Use and Planning • Noise • Population and Housing • Public Services − Fire Protection − Sheriff Protection − Parks − Libraries • Recreation • Transportation & Traffic • Utilities and Services Systems − Wastewater − Water Supply − Solid Waste • Wildfire The County determined through the Initial Study that the Project would not have the potential to cause significant impacts related to Agricultural and Forestry Resources and Mineral Resources. Therefore, these issues are not analyzed in this Draft EIR. The Initial Study, demonstrating no significant impacts would occur for these issue areas, is included in Appendix A.2 and is summarized in Section 7.0. Additionally, environmental issues analyzed in the Draft EIR that were determined to not result in significant impacts in the Initial Study are further summarized in Section 8.0. Each environmental issue analyzed in the EIR summarizes which specific thresholds are addressed within the section". Can you explain to me how any of the items listed in the DEIR will affect us in a "less than significant" way? 16-4

Residents of Val Verde are finding it hard to get homeowners insurance and keep it, due to this area being labeled as a high fire area. Has anyone thought of that area of concern? In 2007 there was a large brush fire (Ranch Fire) where Val Verde was evacuated. We were assessed extra fees for fire protection in addition to the taxes we pay the county and state for fire protection. We don't have to pay them anymore, we were never refunded that money and you want to build more homes in this high fire area? What makes anyone think those homes will be insurable if the current residents are having trouble? 16-5

What has happened to common sense in our government? It appears to me it is no longer apart of the thought process and there is no longer logical thinking in our government. I seems to me that the only thing that matters is the almighty dollar to large corporations and politicians. Your constituents don't seem to matter anymore. I have never seen K. Barger or M. Antonovich come to Val Verde. 16-6

I hope LA County Planning and the LA County Board of Supervisors reject this project as the only thing I see this project benefiting is the pockets of the developer and the government.

Respectfully,

Susan M. Evans
29830 Lincoln Ave.
Val Verde, CA 91384
Sheffs@pacbell.net
661-702-9782 home
661-433-1380 cell

Cc: Kathryn Barger, 5th District Supervisor, Kathryn@bos.lacounty.gov
Stephanie English, Fired Deputy to Supervisor Barger, SEnglish@bos.lacounty.gov
Castaic Area Town Council, castaictowncouncil@gmail.com
Val Verde Civic Association, vvcivic@gmail.com

COMMENT LETTER NO. 16:

Susan M. Evens
29830 Lincoln Avenue
Val Verde, CA 91384

Comment 16-1:

I am a long time resident of Los Angeles County, born and raised. I have watched the San Fernando Valley "grow" and the Santa Clarita Valley "grow." It has become a very densely populated county and outrageously priced.

I am watching my little piece of rural living being taken away by builders who are only in it for the money they can gain from building outrageously priced homes on postage stamp lots with no concern for the infrastructure that must be in place to support these homes that no one I know of can afford. (I understand the price of these homes will be over $800,000. That is not affordable). I also understand that the reason there was a new water pipe installed from Hasley Canyon into the edge of Val Verde is because of the necessity to satisfy water connections for this project, Sterling Ranch Estates.

Again, LA County is disrespecting this historical town and ignoring the lives of the residents. Between the lack of consideration for our health, with the expansion of the dump that continually violates the CUPs they have been given, the lack of maintenance on our roads, , lack of safe egress to the south from the center of town (still waiting for the "temporary" signal at highway 126 and Chiquito Canyon Road), the lack of updated utilities and the lack of notification of everything that affects this town (oil wells, road closures, pot holes, the creation of a "have versus the have nots" atmosphere and excavating for dead bodies).

Response 16-1:

Please refer to *Response 15-5* regarding land use and population. As discussed in Section 5.12: Population and Housing of the Draft EIR, the Project would include the development of 222 single-family lots consistent with existing land use and zoning designations. The Project would result in an increase of 686 persons and nine employment opportunities to the greater Santa Clarita Valley area. The population, housing, and employment growth assumptions were considered in the regional projections. The Project would represent approximately 1.6, 5.5, and 0.08 percent of SCAG 2040 projections for population, housing, and employment, respectively. Such levels of growth are consistent with the population forecasts for the subregion as adopted by SCAG. The Project is also consistent with the types, intensity, and patterns of land use envisioned for this region.

The Project as described and analyzed in the Draft EIR is the proposed subdivision of the site to create 222 single-family lots consistent with existing land use and zoning designations. No homes have been designed at this time and no information is available regarding the likely prices of homes that would be developed

on the proposed residential lots. Further, the prices of the homes that could be developed on proposed residential lots is an economic, and not an environmental, matter. Per Section 15131(A), the economic or social effects of a project will not be treated as significant effects on the environment. As this comment does not address the information, analysis, or conclusions of the Draft EIR, no further response is necessary.

Please refer to *Response 9-9* regarding the improvements to the intersection of Chiquito Canyon Road and SR-126.

Comment 16-2:

This project says it will put in a newly aligned road. Great, but what happens when that new road connects to Chiquito Canyon Road (only one lane in each direction) in Val Verde? That intersection will become a hazard for those living in this area and those "new" residents in Hasley Canyon who will discover this "shortcut" from Castaic to the 126.

Response 16-2:

As discussed in the Draft EIR, Del Valle Road would require roadway improvements to ensure user safety and the Project would widen Del Valle Road to 64 feet within approximately 80 feet of public right-of-way, increasing roadway safety for all users. This would allow Del Valle Road to meet current County standards for a Limited Secondary Highway. The Project's improvements to Del Valle Road would include the implementation of the planned Class III Bike Route as identified in the County's 2012 Bicycle Master Plan. The Project would continue to facilitate transit access to and through the Project site. Existing buses would benefit from the new roadway alignment along Del Valle Road, which is more direct and would reduce transit travel time. Additionally, the Project would include recommended mitigation to relocate a nearby existing bus stop on Del Valle Road to the proposed Sterling Ranch Parkway at a location in direct proximity to the proposed commercial retail and park uses.

The extension of Chiquito Canyon Road as Sterling Parkway also would provide access to the Project site and would include four new intersections with local roadways constructed within the Project site. The proposed Sterling Parkway would provide one lane in each direction and would extend north from Hunstock Avenue to Del Valle Road as a designated limited secondary highway within 80 feet of public right-of-way.

The Project roadways would be designed consistent with the Castaic Area CSD but in such a way to reduce motor vehicle speeds with traffic-calming features such as pedestrian crossing signage, crosswalks at commercial and park areas, and feedback signs indicating speed of vehicles along Del Valle Road throughout the VTTM site and Off-Site Roadway Improvement Area, as recommended in **MM 5.15-3**. Road improvements would also further reduce VMT associated with the residential vehicle trips through the

inclusion of mitigation measures including, but not limited to, the provision to provide community wireless internet connection to encourage tele-commuting; crosswalks at appropriate locations for on-site streets and intersections such as near the commercial and park areas; and amenities for neighborhood electric vehicles (NEVs). The Draft EIR identifies the following mitigation measure requiring the incorporation of traffic-calming measures into the final design of the Project, consistent with the recommendation in this comment.

MM 5.15-3: Prior to the issuance of building permits and final Project design, the Project Developer shall incorporate the location of traffic calming measures, such as marked crosswalks at appropriate locations, for on-site streets and intersections. Specific measures shall comply with the Castaic Area Community Standards District (CSD) and shall be approved by LACDPW.

Comment 16-3:

I have been asked to restrict my water consumption, but you want to build over 20,000 homes within 5 miles of my house. The location of the water tank for this project is 3-5 miles further into Val Verde. Who is benefitting from these housing tracts? The builders and LA County, that's who. Do you not know about the underground river flowing north to south through Val Verde?

Response 16-3:

This comment indicates concern over water consumption and the location of the water tank location. Please refer to *Response 9-3* regarding water supply. As discussed in Section 5.12: Population and Housing of the Draft EIR, the Los Angeles County Waterworks District No. 36 has required the Applicant to provide additional water storage. The Off-Site Water Tank Area is located within the existing Cuyama water tank site owned and operated by District No. 36. Two existing water tanks are located directly to the west of the proposed one million-gallon water tank location. The water tank would be sized to accommodate the Project and additional fire-fighting capacity in the surrounding Val Verde community. Additionally, as discussed in Section 5.13.1: Fire Protection of the Draft EIR, the location of the water tank was determined to provide minimum fire-flow requirements for the Project by District No. 36. The geology and soils studies for the Project site and the Off-Site Water Tank Area analyze and consider the effect of groundwater on the design of the Project.

Comment 16-4:

The process for this project was horribly advertised. I have read a major portion of the 900+ pages of the EIR and I am shocked to see how many of the tables are slated as "less than significant". "This Draft EIR focuses on changes to the environment that would result from implementation of the Project, individually and cumulatively with other development projects. This Draft EIR identifies potentially significant direct and indirect impacts resulting from construction and operation of the Project and identifies mitigation measures to reduce or avoid such effects. Based on the review of environmental issues by the County, this

Draft EIR analyzes the following environmental topics: 2.0 Introduction County of Los Angeles 2.0-3 Sterling Ranch Estates Residential Project Draft Environmental Impact Report November 2021 • Aesthetics • Air Quality • Biological Resources • Cultural Resources • Energy • Geology and Soils • Greenhouse Gas Emissions • Hazards and Hazardous Materials • Hydrology and Water Quality • Land Use and Planning • Noise • Population and Housing • Public Services − Fire Protection − Sheriff Protection − Parks − Libraries • Recreation • Transportation & Traffic • Utilities and Services Systems − Wastewater − Water Supply − Solid Waste • Wildfire The County determined through the Initial Study that the Project would not have the potential to cause significant impacts related to Agricultural and Forestry Resources and Mineral Resources. Therefore, these issues are not analyzed in this Draft EIR. The Initial Study, demonstrating no significant impacts would occur for these issue areas, is included in Appendix A.2 and is summarized in Section 7.0. Additionally, environmental issues analyzed in the Draft EIR that were determined to not result in significant impacts in the Initial Study are further summarized in Section 8.0. Each environmental issue analyzed in the EIR summarizes which specific thresholds are addressed within the section". Can you explain to me how any of the items listed in the Draft EIR will affect us in a "less than significant" way?

Response 16-4:

As required by CEQA, the analysis and conclusions in the Draft EIR are based on substantial evidence. Section 15384(a) of the CEQA Guidelines indicates that substantial evidence means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Whether a fair argument can be made that a project may have a significant effect on the environment is to be determined by examining the whole record before the Lead Agency. Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment do not constitute substantial evidence. Section 15384(b) of the CEQA Guidelines indicates that substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.

Comment 16-5:

Residents of Val Verde are finding it hard to get homeowners insurance and keep it, due to this area being labeled as a high fire area. Has anyone thought of that area of concern? In 2007 there was a large brush fire (Ranch Fire) where Val Verde was evacuated. We were assessed extra fees for fire protection in addition to the taxes we pay the county and state for fire protection. We don't have to pay them anymore, we were never refunded that money and you want to build more homes in this high fire area? What makes anyone think those homes will be insurable if the current residents are having trouble?

Response 16-5:

CEQA's purpose is to analyze a project's potential effects on the environment and is designed to inform government decision-makers and the public about a project's potential environmental impacts. CEQA also

requires an EIR to identify ways to reduce or avoid impacts by requiring mitigation measures to prevent potentially significant impacts. Insurance is currently not a topic that is examined under CEQA.

As discussed in *Response 9-5* and analyzed in Section 5.18: Wildfire of the Draft EIR, the Project would be constructed in compliance with applicable CBSC and CFC regulations that would ensure that appropriate measures, including fire prevention and fuel modification features, are provided, so that urban development would not expose Project occupants to increased and uncontrolled wildfire hazards. The Project would meet fire hardening requirements for projects located in a Very High Fire Hazard Severity Zone, including Chapter 7A of the California Building Code, Chapter 49 of the California Fire Code and, Section R337 of the California Residential Code as adopted and amended by the County of Los Angeles. The Project would be designed and developed in accordance with County Building Code requirements and has an approved Fuel Modification Plan that meets the criteria for the development area. The Project would construct a one-million-gallon water tank on the Off-Site Water Tank Area. The water tank would be sized to accommodate the Project and additional fire-fighting capacity in the surrounding Val Verde community, in accordance with Los Angeles County Waterworks District No. 36 requirements.

Comment 16-6:

What has happened to common sense in our government? It appears to me it is no longer apart of the thought process and there is no longer logical thinking in our government. It seems to me that the only thing that matters is the almighty dollar to large corporations and politicians. Your constituents don't seem to matter anymore. I have never seen K. Barger or M. Antonovich come to Val Verde.

I hope LA County Planning and the LA County Board of Supervisors reject this project as the only thing I see this project benefiting is the pockets of the developer and the government.

Response 16-6:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no response is necessary.

January 30, 2022

Jodie Sackett
County of Los Angeles
Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

VIA electronic mail: jsackett@planning.lacounty.gov

Subject: Response to Draft Environmental Impact Report for STERLING RANCH ESTATES
PROJECT NO. 03-250-(5)
VESTING TENATIVE TRACT MAP NO. 060257
CONDITIONAL USE PERMIT NO. 03-250
OAK TREE PERMIT NO. 200700007
ENVIRONMENTAL ASSESSMENT NO. 03-250
STATE CLEARING HOUSE NO. 2019080092

Dear Jodie Sackett,

I have to respond further (original email 1-9-2022) since the comment period was extended for the Sterling Ranch Homes project No. 03-250-)5).

I have looked at the sections for the utilities. Each and every category state the level of significance is "less than significant". 17-1

I am trying to understand how this project's impacts on us will be "less than significant". Our water connections, electrical connections, natural gas connection, and phone connections are all at least 40 years old if not older.

This town came to life in the 1920's. I cannot get good internet service because the phone lines cannot handle the new technology and AT&T is not updating the infrastructure. I cannot get television service without going to a satellite service. This town does not have good water services because the pipes are at least 40 years old or older, except for the new pipe that I am led to believe was installed along Del Valle for the benefit of this specific project. This town is on septic systems and has no sidewalks as it is considered a "rural" area. This town has no cell service unless you have a booster or are connected to your own wi-fi. LASD claims they cannot use their cell phones or radios in this town. That to me is pretty scary on its own. 17-2

This project will possibly bring in over 200 new cars to the area that is NOT set up to handle that kind of traffic. Please do not forget about the project of Williams Ranch at Dell Valle and Hasley Canyon. How many homes are going in there? Those residents will quickly learn to drive through Val Verde to get to the 126. That will make our little town a traffic nightmare. We only have a few stop signs that people blatantly blow through. They also wave to the CHP as they do it. 17-3

We are being told to conserve water, yet I could not find anything that says who is going to provide the water for this project. 17-4

Val Verde is considered a Very High Fire Hazard Severity Zone (VHFHSZ). Residents have trouble getting and keeping insurance because of this status. How are these homes going to be better for us if they are also in this high fire danger area and can't get insurance. If these homes do get insurance how long before the insurance companies realize the high fire danger and cancel the policies? This is a significant concern. Add to that concern, we are in a drought. 17-5

It would appear there are many phases of this project. How long before the residents don't have to listen to the noise, breathe the dusty air in addition to the extra traffic and heavy equipment? 17-6

What kind of price point are these homes going to be? I don't believe they will be what I consider affordable. No one I know could afford any new homes these days with prices being $600,000 and up. 17-7

I want to address the homes Hunt Williams wants to build on the east side of Del Valle that would back up to Silver St. Silver Street already had that hill slide down into their homes before anything was intended to be built on it. Now you want to build homes on top of a hill that is known to slide down in the rain? That seems a bit reckless to me. 17-8

Mr. Williams has said this land is a legacy to his grandfather. If so, then he and his family should donate or deed it to LA County as an open space in his grandfather's name, in my opinion. 17-9

Respectfully,

Susan M. Evans
29830 Lincoln Ave.
Val Verde, CA 91384
Sheffs@pacbell.net
661-702-9782 home
661-433-1380 cell

Cc: Kathryn Barger, 5th District Supervisor, Kathryn@bos.lacounty.gov
Stephanie English, Fired Deputy to Supervisor Barger, SEnglish@bos.lacounty.gov
Castaic Area Town Council, castaictowncouncil@gmail.com
Val Verde Civic Association, vvcivic@gmail.com

COMMENT LETTER NO. 17:

Susan M. Evans
29830 Lincoln Ave.
Val Verde, CA 91384

Comment 17-1:

I have to respond further (original email 1-9-2022) since the comment period was extended for the Sterling Ranch Homes project No. 03-250-5).

I have looked at the sections for the utilities. Each and every category state the level of significance is "less than significant".

Response 17-1:

All of the conclusions in the Draft EIR regarding the potential significance of the impacts for each topic evaluated for the Project are based on the information and analysis presented in the Draft EIR.

Comment 17-2:

I am trying to understand how this project's impacts on us will be "less than significant." Our water connections, electrical connections, natural gas connection, and phone connections are all at least 40 years old if not older.

This town came to life in the 1920's. I cannot get good internet service because the phone lines cannot handle the new technology and AT&T is not updating the infrastructure. I cannot get television service without going to a satellite service. This town does not have good water services because the pipes are at least 40 years old or older, except for the new pipe that I am led to believe was installed along Del Valle for the benefit of this specific project. This town is on septic systems and has no sidewalks as it is considered a "rural" area. This town has no cell service unless you have a booster or are connected to your own wi-fi. LASD claims they cannot use their cell phones or radios in this town. That to me is pretty scary on its own.

Response 17-2:

Please see Section 5.17: Utilities and Service Systems, in the Draft EIR for information and analysis of the Project's potential to impact the existing utility systems in the area, including water service in Section 5.17.1, sewer service in Section 5.17.2, and dry utilities, including telecommunications, electricity, and natural gas service, in Section 5.17.4. The improvements required to provide adequate service to the Project as proposed are described in these sections. Based on substantial evidence, the Draft EIR concludes, with construction of the required improvements, adequate utility capacity will be available for the Project's proposed uses.

Comment 17-3:

This project will possibly bring in over 200 new cars to the area that is NOT set up to handle that kind of traffic. Please do not forget about the project of Williams Ranch at Del Valle and Hasley Canyon. How many homes are going in there? Those residents will quickly learn to drive through Val Verde to get to the 126. That will make our little town a traffic nightmare. We only have a few stop signs that people blatantly blow through. They also wave to the CHP as they do it.

Response 17-3:

Project roadway designs would be consistent with the Castaic Area CSD and would reduce motor vehicle speeds with traffic-calming features such as pedestrian-crossing signage, crosswalks at commercial and park areas, and feedback signs indicating speed of vehicles along Del Valle Road throughout the VTTM site and Off-Site Roadway Improvement Area as recommended in **MM 5.15-3**. Del Valle Road would continue to provide one lane in each direction and would be widened to meet current County standards for a Limited Secondary Highway. The Project's improvements to Del Valle Road would increase the visibility and safety of this public road. Implementation of MM 5.15-2 through MM 5.15-6 would reduce the Project's contribution to cumulative VMT. As the Project's contribution to potentially significant VMT impacts may be cumulatively considerable, the Draft EIR conservatively concludes that the Project's related VMT would result in significant cumulative impacts. The Project is consistent with fair-share costs because identified impacts are cumulative impacts. As such, the Project is responsible for its fair-share of the costs of the identified mitigation measures. MM 5.15-7 through MM 5.15-11 would implement various improvements to local roadways in the vicinity of the Project to mitigate and reduce potential cumulative impacts. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

Comment 17-4:

We are being told to conserve water, yet I could not find anything that says who is going to provide the water for this project.

Response 17-4:

Please refer to *Response 9-3* regarding water supply and *Response 9-13* regarding the Project's consistency with growth projections regarding water supply.

The Project does not meet the definition of a Water Demand Project under Section 15155(a)(1)(A) of the CEQA Guidelines. As the Project would contain less than 500 homes at buildout, a water supply analysis is not required.

Comment 17-5:

Val Verde is considered a Very High Fire Hazard Severity Zone (VHFHSZ). Residents have trouble getting and keeping insurance because of this status. How are these homes going to be better for us if they are also in this high fire danger area and can't get insurance. If these homes do get insurance how long before the insurance companies realize the high fire danger and cancel the policies? This is a significant concern. Add to that concern, we are in a drought.

Response 17-5:

This Project Site is located in a VHFHSZ as fully described and disclosed in the Draft EIR. As discussed in *Response 9-5* and analyzed in Section 5.18: Wildfire of the Draft EIR, the Project would be constructed in compliance with applicable CBSC and CFC regulations that would ensure that appropriate measures, including fire prevention and fuel modification features, are provided, so that urban development would not expose Project occupants to increased and uncontrolled wildfire hazards. The Project would meet fire hardening requirements for projects located in a VHFHSZ, including Chapter 7A of the California Building Code, Chapter 49 of the California Fire Code and, Section R337 of the California Residential Code as adopted and amended by the County of Los Angeles. The Project would be designed and developed in accordance with the County Building Code requirements and has an approved fuel modification plan that meets the criteria for the development area. The Project would construct a one-million-gallon water tank in the Off-Site Water Tank Area. The water tank would be sized to accommodate the Project and additional fire-fighting capacity in the surrounding Val Verde community, in accordance with Los Angeles County Waterworks District No. 36 requirements. The Project has been designed to be defensible against wildfires and the impact of wildfires on the Project was determined to be less than significant.

With regard to the availability of homeowner's insurance, this is an economic issue and not an environmental issue. Please note that CEQA Guidelines Section 15131(A) states that the economic or social effects of a project will not be treated as significant effects on the environment. As described above, the Project has been designed to meet all applicable standards for development in a VHFHSZ area.

Comment 17-6:

It would appear there are many phases of this project. How long before the residents don't have to listen to the noise, breathe the dusty air in addition to the extra traffic and heavy equipment?

Response 17-6:

As described in Section 3.0-5.a Project Description, Construction and Grading, of the Draft EIR, grading of the Project site and installation of utilities would be accomplished in a single, seven-month phase. This is the phase of construction that would involve the use of the most pieces of heavy equipment and, for this reason, the potential for noise and dust would be greatest during this phase of construction. Following the completion of grading and site improvements, homes would be built on individual lots and development

of the commercial parcel would occur based on market conditions. The VTTM identifies six potential phases of development and construction of the homes and commercial center could occur over a four-to-six-year period as identified on page 3.0-26 in the Draft EIR.

As discussed in Section 5.11: Noise in the Draft EIR, Figure 5.11-3 indicates the location of sensitive receptors. Pursuant to the County Noise Ordinance, construction would be limited to between the hours of 7:00 AM and 7:00 PM and would not be permitted anytime on Sundays or legal holidays. Regulatory compliance would include optimal muffler systems for all equipment to reduce construction noise levels by approximately 10 dB or more. Implementation of MM 5.11-1 would reduce construction-related noise levels to below the County's mobile equipment noise levels through various construction management techniques, including siting equipment as far away as possible from sensitive uses, minimizing the amount of equipment within close proximity of sensitive uses, and incorporating best available technology to break the line-of-sight between construction equipment and noise sensitive uses consistent with County policies. As part of the mitigation, the number heavy construction equipment pieces operating within 50 feet of a noise-sensitive use would be limited to two pieces operating simultaneously, and the use of temporary attenuation devices would be implemented in close proximity to residential structures during grading activities. With implementation of MM 5.11-1, construction noise levels would be reduced by a minimum of 17 dBA, dependent on the construction activity and height of the temporary noise barrier used. As such, construction noise would be less than significant with mitigation incorporated.

Regarding temporary dust impacts during construction, as discussed in Section 5.2: Air Quality in the Draft EIR, the Project would be required to comply with SCAQMD Rule 403 for fugitive dust. Rule 403 requires the use of stringent best available control measures to minimize PM10 emissions during grading and construction activities, including measures to prevent the generation of visible dust plumes. Measures include, but are not limited to, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system or other control measures to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project site, and maintaining effective cover over exposed areas. The mitigation measures identified in the Draft EIR would mitigate potential impacts from dust emissions to less than significant during the seven-month grading period.

Regarding extra traffic and construction equipment, as discussed in Section 5.15: Transportation, access to the VTTM site for construction trucks and construction workers would be provided from SR-126 to Commerce Center Drive to Hasley Canyon Road to Del Valle Road, or from the I-5 Freeway to Hasley Canyon Road and Del Valle Road. Access to the Off-Site Water Tank Area for construction trucks and construction workers would be provided from SR-126 to Chiquito Canyon Road to San Martinez Road, or from the I-5 Freeway to Hasley Canyon Road to Del Valle Road to San Martinez Road. Construction personnel would park at the Project site. Each phase of Project construction would result in varying levels of intensity and

number of construction personnel. The construction workforce would consist of twenty-five to thirty workers during the site clearing and grading phase, fifteen to twenty-five workers during the utilities phase, twenty to thirty-five workers during the concrete and paving phase, and forty to fifty workers during the building phase. Construction would occur Monday through Friday between 7:00 AM and 3:00 PM. The number of daily delivery and haul trucks would be between eight to fifteen round-trips during the utilities phase, approximately twenty round-trips during the concrete and paving phase, and twenty round-trips during the building phase. The site clearing and subsequent grading activities would be balanced on site and, for this reason, no daily delivery or haul trucks are expected during these initial phases of construction.

The construction activities may involve temporary lane closures for utility improvements, generally one-lane closures to maintain through access on all roadways. This may result in temporary increases in travel time from flagging or stopping of traffic to accommodate trucks entering and exiting the Project site during construction. Implementation of Mitigation Measure MM 5.15-1, which requires a detailed Construction Traffic Management Plan, would ensure emergency vehicle access during all aspects of Project construction.

Comment 17-7:

What kind of price point are these homes going to be? I don't believe they will be what I consider affordable. No one I know could afford any new homes these days with prices being $600,000 and up.

Response 17-7:

The Project as described and analyzed in the Draft EIR is the proposed subdivision of the site to create 222 single-family lots consistent with existing land use and zoning designations. No homes have been designed at this time and no information is available regarding the likely prices of homes that would be developed on the proposed residential lots.

The prices of the homes that could be developed on proposed residential lots is an economic, and not an environmental, matter. Per Section 15131(A), the economic or social effects of a project will not be treated as significant effects on the environment. This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no further response is necessary.

Comment 17-8:

I want to address the homes Hunt Williams wants to build on the east side of Del Valle that would back up to Silver St. Silver Street already had that hill slide down into their homes before anything was intended to be built on it. Now you want to build homes on top of a hill that is known to slide down in the rain? That seems a bit reckless to me.

Response 17-8:

As discussed in Section 5.6: Geology and Soils in the Draft EIR, geotechnical investigations were prepared, approved by the County, and are included in Appendices F.1 through F.8 of the Draft EIR. The Project would be subject to the standards for development in the California Building Code and Los Angeles County Building Code. The Project has been designed to meet all applicable hillside development standards. The standards for hillside development are intended to ensure that development in hillside areas maintains the natural topography, resources, and amenities of these areas. The Project would incorporate some sensitive hillside design techniques, such as contour grading, retention of natural vegetation, and undulating slopes. The Project site does not contain primary or secondary ridgelines. The Project preserves some of the highest points within the VTTM site. Though smaller hillside slopes on the VTTM site have minimal scenic value from a regulatory/regional standpoint, they have local scenic value, as they consist of the foreground of the existing landscape that includes the larger slopes and ridges in the background, further away from Del Valle Road. The slopes having maximum scenic value, particularly the highest points within the VTTM site, would be retained as part of the Project. The Project would comply with all required County standards and requirements related to grading and construction within hillsides and would ensure consistency with policies related to slope stability and soils. The Los Angeles County-adopted General Plan hillside design standards are included in Table 5.10-1 of the Draft EIR as well as a discussion of the Project's consistency with the pre-2015 Hillside Management Ordinance in Section 5.10: Land Use and Planning. These Project features would protect the scenic hillside views, consisting of slopes, hilltop summits, and ridgelines, and conserve natural hillside character. Based on the information and analysis in the Draft EIR, the Project would have a less-than-significant impact on geology and soils issues.

Comment 17-9:

Mr. Williams has said this land is a legacy to his grandfather. If so, then he and his family should donate or deed it to LA County as an open space in his grandfather's name, in my opinion.

Response 17-9:

As discussed in the Draft EIR, the Project includes an Off-Site Open Space Dedication Area, which contains 37.9 acres of open space and is located southeast of the VTTM site as illustrated in Figure 3.0-9 of the Draft EIR. No development would occur within the Off-Site Open Space Dedication Area. Further, as discussed in Section 5.10: Land Use and Planning of the Draft EIR, the Project is consistent with the land use designation, zoning, development standards, goals, objectives, and policies of the Los Angeles County General Plan, SCVAP 2012, Los Angeles County Code, and Castaic Area CSD. As this comment does not address the information, analysis, or conclusions in the Draft EIR, no further response is necessary.

January 4, 2022

Jodie Sackett
County of Los Angeles
Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

VIA Electronic Mail: jsackett@planning.lacounty.gov

Subject: Response to Draft Environmental Impact Report for STERLING RANCH ESTATES
PROJECT NO. 03-250-(5)
VESTING TENTATIVE TRACT MAP NO. 060257
CONDITIONAL USE PERMIT NO. 03-250
OAK TREE PERMIT NO. 200700007
ENVIRONMENTAL ASSESSMENT NO. 03-250
STATE CLEARINGHOUSE NO. 2019080092

Dear Jodie Sacket,

My family and I are long-standing residents of the historical community of Val Verde Canyon, in the town of Castaic, and we want to go on record that we oppose this development. The Environmental Impact Report (DEIR) for the proposed project does not acknowledge how bad it will affect my family's lives directly. 18-1

My wife works graveyard for a hospital as a first responder, and we live one house back from the entrance of this large proposed HOA tract housing development. It will take years to build this out which will cause a great amount of noise for a very long extended period of time. How does this development propose to keep the daily rural life in our currently quiet country setting "quiet" for people like my wife who has lived here for more than 25 years? There are many of us who came to this area for that reason. She needs to sleep during the day, and living in a more developed town/city doesn't provide that environment. Where do you propose all the needed first responders who work graveyard that live out here are to live now? I know we are not the only ones. 18-2

This section of Val Verde canyon is also in the shadow of one of the largest landfills in the country. How can Los Angeles County Regional Planning think this is a good place to add another 222 homes? Chiquita Canyon Landfill continually is issued Notices of Violation for multiple things including odor nuisances. It down and out stinks here a lot. As noted, thankfully my wife is asleep most days and we are not outside in it. Will the new homeowners of these very expensive homes be well notified of the giant landfill so close by? We cannot keep our windows open on nice weather days to allow fresh air in. We have higher utilities bills to keep our home comfortable and avoid it smelling like a giant rotting trash can than someone not living so close to a landfill. The landfill has a new 30-year CUP and is not going anywhere anytime soon (opposite what many of us were made to believe by our past County Supervisor). Please explain the benefits these new people would have living so close to a stinky landfill? This is a fact and not just an opinion. The notice of violations are on record. 18-3

I understand this county and state are in desperate need for very-low and low-income housing. The Sterling Estates HOA community with private trails will not help that problem at all. Will these houses be $300,000 or less? Will any of them rent for $2,000 a month or less? This is not remotely possible with a private HOA community. They most likely will start around $800,000 and go up from there. Even if the houses are a little less, by adding HOA fees and most likely Mello Roos too, they will be the equivalent if not more need income wise than an $800,000 home without those extra fees. What this project does is destroy a long standing historical rural country canyon. It places two very different finical level classes and living standards side by side. There is absolutely no transition from one lifestyle/level to another. 18-4

Over the decades living here it has become obvious this is a very volatile high fire risk area. Getting homeowners insurance is nearly impossible and quality insurance is a joke. By adding 222 expensive tract homes in this area only adds to the risk of loss out here. Additionally, it will cause a bottleneck during an evacuation with way too many people trying to leave at once. The County will be held accountable in the event of unnecessary deaths. 18-5

I would also like it noted that I have contacted our Castaic Area Town Council representative for Val Verde as well as the Val Verde Civic Association to inquire if they were made aware of this hearing and commenting period. Both organizations responded that they had not been notified. I live only a few yards from one of the property lines for this project and also did not receive any form of notice. I do not believe this a respectable way to do business and it has not allowed me the necessary time to really review this DEIR. I am sure my family would have more specific items to comment on. We believe this project is going to bring harm to this historical canyon and destroy the quiet rural way of life established here for a hundred years. There are "community standards" that were established for this area and they should be upheld. This project simply cannot keep this canyon a rural setting. 18-6

Please direct any questions regarding these comments, as well as appropriate responses to our questions in this letter, to us at llocksley@yahoo.com.

Respectfully,

Brad & Jennifer Fields
Residents of Val Verde Canyon

cc Kathryn Barger, 5th District Supervisor, Kathryn@bos.lacounty.gov
Stephanie English, Field Deputy to Supervisor Barger, SEnglish@bos.lacounty.gov
Castaic Area Town Council, castaictowncouncil@gmail.com
Val Verde Civic Association, vvcivic@gmail.com

COMMENT LETTER NO. 18:

Brad and Jennifer Fields
Residents of Val Verde Canyon

Comment 18-1:

My family and I are long-standing residents of the historical community of Val Verde Canyon, in the town of Castaic, and we want to go on record that we oppose this development. The Environmental Impact Report (Draft EIR) for the proposed project does not acknowledge how bad it will affect my family's lives directly.

Response 18-1:

The purpose of the Draft EIR as defined by CEQA and the CEQA Guidelines is to inform government decision-makers and the public about the Project's potential environmental impacts and identify ways to reduce or avoid any significant impacts. Please see the responses to the individual comments in this letter. This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no further response to this comment is necessary.

Comment 18-2:

My wife works graveyard for a hospital as a first responder, and we live one house back from the entrance of this large proposed HOA tract housing development. It will take years to build this out which will cause a great amount of noise for a very long extended period of time. How does this development propose to keep the daily rural life in our currently quiet country setting "quiet" for people like my wife who has lived here for more than 25 years? There are many of us who came to this area for that reason. She needs to sleep during the day, and living in a more developed town/city doesn't provide that environment. Where do you propose all the needed first responders who work graveyard that live out here are to live now? I know we are not the only ones.

Response 18-2:

Please see *Response 17-6*. As discussed in Section 5.11: Noise of the Draft EIR, Figure 5.11-3 identifies the location of uses that would be sensitive to noise generated by construction of the Project. Pursuant to the County Noise Ordinance, construction would be limited to between the hours of 7:00 AM and 7:00 PM and would not be permitted anytime on Sundays or legal holidays. Regulatory compliance would include optimal muffler systems for all equipment to reduce construction noise levels by approximately 10 dB or more. Implementation of MM 5.11-1 would reduce construction-related noise levels to below the County's mobile equipment noise levels through various construction management techniques, including siting equipment as far away as possible from sensitive uses, minimizing the amount of equipment within close proximity of sensitive uses, and incorporating best available technology to break the line-of-sight between construction equipment and noise-sensitive uses consistent with County policies. As part of the mitigation,

the number of heavy construction equipment within 50 feet of a sensitive receptor would be limited to two pieces operating simultaneously, and the use of temporary attenuation devices would be implemented in close proximity to residential structures during grading activities. With implementation of MM 5.11-1, construction noise levels would be reduced by a minimum of 17 dBA, dependent on the construction activity and height of the temporary noise barrier used. As such, construction noise would be less than significant with mitigation incorporated.

Comment 18-3:

This section of Val Verde canyon is also in the shadow of one of the largest landfills in the country. How can Los Angeles County Regional Planning think this is a good place to add another 222 homes? Chiquita Canyon Landfill continually is issued Notices of Violation for multiple things including odor nuisances. It down and out stinks here a lot. As noted, thankfully my wife is asleep most days and we are not outside in it. Will the new homeowners of these very expensive homes be well notified of the giant landfill so close by? We cannot keep our windows open on nice weather days to allow fresh air in. We have higher utilities bills to keep our home comfortable and avoid it smelling like a giant rotting trash can than someone not living so close to a landfill. The landfill has a new 30-year CUP and is not going anywhere anytime soon (opposite what many of us were made to believe by our past County Supervisor). Please explain the benefits these new people would have living so close to a stinky landfill? This is a fact and not just an opinion. The notice of violations are on record.

Response 18-3:

Please refer to *Response 9-3* regarding the issues of air quality and odors associated with the Chiquito Canyon landfill.

Comment 18-4:

I understand this county and state are in desperate need for very-low and low-income housing. The Sterling Estates HOA community with private trails will not help that problem at all. Will these houses be $300,000 or less? Will any of them rent for $2,000 a month or less? This is not remotely possible with a private HOA community. They most likely will start around $800,000 and go up from there. Even if the houses are a little less, by adding HOA fees and most likely Mello Roos too, they will be the equivalent if not more need income wise than an $800,000 home without those extra fees. What this project does is destroy a long standing historical rural country canyon. It places two very different finical level classes and living standards side by side. There is absolutely no transition from one lifestyle/level to another.

Response 18-4:

The Project as described and analyzed in the Draft EIR is the proposed subdivision of the site to create 222 single-family lots consistent with existing land use and zoning designations. No homes have been designed at this time and no information is available regarding the likely prices of homes that would be developed on proposed residential lots. The prices of the homes that could be developed on proposed residential

lots is an economic, and not an environmental, matter. Per Section 15131(A), the economic or social effects of a project will not be treated as significant effects on the environment.

Please refer to *Response 14-3* regarding land use and population.

Comment 18-5:

Over the decades living here it has become obvious this is a very volatile high fire risk area. Getting homeowners insurance is nearly impossible and quality insurance is a joke. By adding 222 expensive tract homes in this area only adds to the risk of loss out here. Additionally, it will cause a bottleneck during an evacuation with way too many people trying to leave at once. The County will be held accountable in the event of unnecessary deaths.

Response 18-5:

Please see *Response 7-19* regarding wildfire risk and evacuations.

Comment 18-6:

I would also like it noted that I have contacted our Castaic Area Town Council representative for Val Verde as well as the Val Verde Civic Association to inquire if they were made aware of this hearing and commenting period. Both organizations responded that they had not been notified. I live only a few yards from one of the property lines for this project and also did not receive any form of notice. I do not believe this a respectable way to do business and it has not allowed me the necessary time to really review this Draft EIR. I am sure my family would have more specific items to comment on. We believe this project is going to bring harm to this historical canyon and destroy the quiet rural way of life established here for a hundred years. There are “community standards” that were established for this area and they should be upheld. This project simply cannot keep this canyon a rural setting.

Response 18-6:

Please refer to *Response 12-1* regarding the comment period.

Please refer to *Response 14-3* regarding the consistency of the Project with the CSD. The Project is consistent with the development standards, goals, objectives, and policies of the Los Angeles County General Plan, SCVAP 2012, Los Angeles County Code, and Castaic Area CSD.

From: Jodie Sackett
To: Tony Locacciato
Subject: Fw: Project 03-250-(5) Vesting Tentative Tract Map No. 060257 Conditional Use Permit No. 03-250 Sterling Ranch Estates
Date: Monday, January 10, 2022 5:32:58 PM

Jodie Sackett, Subdivisions
County of Los Angeles
Department of Regional Planning

Subdivisions questions: **subdivisions@planning.lacounty.gov**
Planning/zoning questions: **info@planning.lacounty.gov**
Homepage: **www.planning.lacounty.gov**
In response to increased case rates of COVID-19 in Los Angeles County and to protect the health and safety of employees and the public, Regional Planning will be providing all public services virtually. For the most current information about available services, public meeting schedules, and planning projects, please visit planning.lacounty.gov.

From: C Kimura <jnk7777@gmail.com>
Sent: Sunday, January 9, 2022 5:55 PM
To: Jodie Sackett <jsackett@planning.lacounty.gov>
Subject: Project 03-250-(5) Vesting Tentative Tract Map No. 060257 Conditional Use Permit No. 03-250 Sterling Ranch Estates

CAUTION: External Email. Proceed Responsibly.

Dear Mr. Jodie Sackett,

I would like to bring up some safety concerns I have about:
Project 03-250-(5)
Vesting Tentative Tract Map No. 060257
Conditional Use Permit No. 03-250
Sterling Ranch Estates
Mr. Hunt Williams is asking for approval of a project in the same vicinity as the IAC Commerce Center project. Mr. Williams' former project, IAC Commerce Center, Valencia, had geologic flaws in the plan. The plans from Mr. Williams were sold with the land to a developer. The developer followed the plans from Mr. Williams.
After breaking ground, the rains came and the project caused a landslide. A friend and I were walking our dogs, in the area of the slide, after a heavy rain. I heard the rocks sliding and told my friend. Luckily, we left safely and the area of the slide was not inhabited by humans. Due to the landslide, a hillside protected by the CSD, Castaic Community Standards District, was drastically taken down. Today, the once beautiful hillside has been replaced with one that is obviously, artificially sloped (see photos attached for the progression of the slide and the current view of the protected hillside). This has created a decrease in property value, as homeowners' views were compromised. To this date, Mr. Williams has done nothing to bring the individuals. who had lost something, back to their former status. 19-1
The current proposed plan includes homes that people will be living in and roads that are traveled by motorists. If there are flaws in the plans, I am concerned that lives could be at risk. 19-2

Mr. Williams hired geologists who had made a major mistake on the IAC Commerce Center development. What measures would be in effect to prevent a future environmental impact in the building of the new development? If this happened with the prior development, what assurances do we have this time? There is more than a protected hillside at stake this time. Thank you for your time.

19-3

Sincerely,
Cynthia Kimura
29027 Elk Avenue, Castaic, CA 91384
(562) 498-1106

COMMENT LETTER NO. 19:

Cynthia Kimura
29027 Elk Avenue
Castaic, CA 91384

Comment 19-1:

I would like to bring up some safety concerns I have about:

Project 03-250-(5) Vesting Tentative Tract Map No. 060257

Conditional Use Permit No. 03-250

Sterling Ranch Estates

Mr. Hunt Williams is asking for approval of a project in the same vicinity as the IAC Commerce Center project. Mr. Williams' former project, IAC Commerce Center, Valencia, had geologic flaws in the plan. The plans from Mr. Williams were sold with the land to a developer. The developer followed the plans from Mr. Williams. After breaking ground, the rains came and the project caused a landslide. A friend and I were walking our dogs, in the area of the slide, after a heavy rain. I heard the rocks sliding and told my friend. Luckily, we left safely and the area of the slide was not inhabited by humans. Due to the landslide, a hillside protected by the CSD, Castaic Community Standards District, was drastically taken down. Today, the once beautiful hillside has been replaced with one that is obviously, artificially sloped (see photos attached for the progression of the slide and the current view of the protected hillside). This has created a decrease in property value, as homeowners' views were compromised. To this date, Mr. Williams has done nothing to bring the individuals who had lost something, back to their former status.

Response 19-1:

The Sterling Ranch Estates Residential Project is an individual, legal parcel separated from the IAC Commerce Center by approximately 80 acres of dedicated open space.

The Draft EIR included geology studies for Project site approved by the County of Los Angeles. There are no protected ridgelines and/or hillsides on the Project site. There are no on-site landslides, earthquake faults, or other geological features that would negatively impact the development of the Project site with the proposed residential lots as discussed in Section 5.6: Geology and Soils, in the Draft EIR.

Comment 19-2:

The current proposed plan includes homes that people will be living in and roads that are traveled by motorists. If there are flaws in the plans, I am concerned that lives could be at risk.

Response 19-2:

Please refer to *Response 14-3* regarding land use and community standards. As discussed, the Project is consistent with the development standards, goals, objectives, and policies of the Los Angeles County General Plan, SCVAP 2012, Los Angeles County Code, and Castaic Area CSD.

As discussed in Section 5.15: Transportation of the Draft EIR, the Project includes several Project Design Features (PDF) and Mitigation Measures to reduce potential hazards. The Project would incorporate mitigation measures to further reduce the VMT associated with the residential vehicle trips, including, but not limited to, a provision to provide community wireless internet connection to encourage tele-commuting, crosswalks at appropriate locations for on-site streets, intersections near commercial and park areas, and amenities for neighborhood electric vehicles (NEVs).

PDFs 5.15-1 and 5.15-3 would include pedestrian improvements to facilitate movement from the Project site to the existing community and would be consistent with the Castaic Area CSD. Further, traffic-calming measures, such as crosswalks at commercial and park areas through the implementation of **MM 5.15-3**, would ensure additional safety for pedestrian movement within the VTTM site. The Project would provide pedestrian connectivity and improvements by linking external pedestrians to the Project site at locations where there are currently gaps in the existing pedestrian network.

The Project roadways would be designed consistent with the Castaic Area CSD and would reduce motor vehicle speeds with traffic-calming features such as pedestrian crossing signage, crosswalks at commercial and park areas, and feedback signs indicating speed of vehicles along Del Valle Road throughout the VTTM site and Off-Site Roadway Improvement Area as recommended in **MM 5.15-3**. Del Valle Road would continue to provide one lane in each direction and would be widened to meet current County standards for a Limited Secondary Highway with increased visibility and safety.

The Project provides a highly livable, outdoor, pedestrian-friendly environment that encourages alternative means of transportation to the automobile by incorporating enhanced pedestrian and bicycle access via a private multiuse trail and an off-site trail easement in a manner consistent with the County's Healthy Design Guidelines and the Castaic Area CSD. Additionally, residents of the Project would have access to Santa Clarita Transit buses and to Metrolink stations in the Santa Clarita region, which provide regional transportation access. Therefore, potential hazards due to a geometric design feature, dangerous intersection, or incompatible use would be less than significant.

Comment 19-3:

Mr. Williams hired geologists who had made a major mistake on the IAC Commerce Center development. What measures would be in effect to prevent a future environmental impact in the building of the new

development? If this happened with the prior development, what assurances do we have this time? There is more than a protected hillside at stake this time.

Response 19-3:

Please see *Response 19-1*. As discussed in Section 5.6: Geology and Soils of the Draft EIR, to evaluate potential hazards relative to geology and soils, preliminary geotechnical investigations were prepared, approved by the County, and are included in Appendices F.1 through F.8 of the Draft EIR. The Project would be subject to local, regional, State, and federal regulations pertaining to geology and soils, including the CBSC and Los Angeles County Building Code regulations. Regulatory measures are included to ensure that the Project would implement the recommendations contained within the Geotechnical Study, included as Appendices F.1 through F.8 of the Draft EIR.

01-08-2022

Jodie Sackett
County of Los Angeles - Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012
Tel: 213-974-6411
jsackett@planning.lacounty.gov

RE: Comment Period for DEIR on Sterling Estates Planning Project No. 03-250-(5)

Dear Mr. Sackett,

My name is Erica Larsen and I am a resident of Val Verde, CA where the Sterling Estates development is slated to be. I am also the president of the Val Verde Civic Association and am sending this letter as a private citizen and not a representative of the community. Though I know you have received an extension request as well as a letter of concern regarding this project from our association which *does* represent the community.

I feel it is vital that the Department of Regional Planning take its due diligence on the DEIR approval process for the Sterling Estates project by extending the comment period for the DEIR by no less than 120 days. In the time the comment period started on November 11 substantial local, county, and national events have impacted the abilities of residents to review, research, comprehend and comment on the 995 page document.

It is vital to give the residents enough time to absorb and participate in the DEIR process for a project that will redefine nearly a quarter of the Val Verde community geography. This project will not only re-route one of only **two** traffic arteries in the community but entirely re-define the topography surrounding it, our viewshed, raises risks of wildfire damage, directly impact nearly 100 homes, and indirectly impact the entire community with the mere scale of the development. To not give the residents more time I feel would be incredibly problematic to the process and create immense issues and hardships in the future. It also streamlines the process to benefit the developer while negating the community.

20-1

Aside from trying to salvage a holiday in the midst of the pandemic, in just my experience, nearly every other person I know has tested positive for covid-19 in the last month. Friends, family, and co-workers are getting sick, some being hospitalized as I write this letter. We have had to focus on keeping our 3 year old safe without his ability to get vaccinated. My work and my husband's work have both been impacted and most of all our time has been focused on navigating just getting by right now. I know that my story is not unlike others here in Val Verde who, like me, feel this DEIR is *very important* to review but just absolutely do not have the time to properly comment on the report with all that is happening right now.

This community has been put in this position by the Department of Regional Planning before and in the past, the department has allowed extensions so our residents can properly participate. This was largely due to understanding that a low income, majority Spanish speaking community with many essential workers in it will need more time, especially if the comment period is over the holidays, to be able to participate in this process. **I want to emphasize that extensions were given to our community on projects like this before this pandemic.**

20-1

I do not feel an extension is a hard request to fulfill so I do hope that Regional Planning will extend the comment period by 120 days AT THE LEAST to accommodate the residents as we navigate a pandemic currently peaking at historical numbers and impacting our lives in a variety of ways.

Please include this letter in the administrative record and provide a confirmation of your receipt of this correspondence.

Thank you for your time and consideration.

Sincerely,

Erica E. Larsen

COMMENT LETTER NO. 20:

Erica E. Larsen

Comment 20-1:

My name is Erica Larsen and I am a resident of Val Verde, CA where the Sterling Estates development is slated to be. I am also the president of the Val Verde Civic Association and am sending this letter as a private citizen and not a representative of the community. Though I know you have received an extension request as well as a letter of concern regarding this project from our association which does represent the community.

I feel it is vital that the Department of Regional Planning take its due diligence on the Draft EIR approval process for the Sterling Estates project by extending the comment period for the Draft EIR by no less than 120 days. In the time the comment period started on November 11 substantial local, county, and national events have impacted the abilities of residents to review, research, comprehend and comment on the 995 page document.

It is vital to give the residents enough time to absorb and participate in the Draft EIR process for a project that will redefine nearly a quarter of the Val Verde community geography. This project will not only re-route one of only two traffic arteries in the community but entirely re-define the topography surrounding it, our viewshed, raises risks of wildfire damage, directly impact nearly 100 homes, and indirectly impact the entire community with the mere scale of the development. To not give the residents more time I feel would be incredibly problematic to the process and create immense issues and hardships in the future. It also streamlines the process to benefit the developer while negating the community.

Aside from trying to salvage a holiday in the midst of the pandemic, in just my experience, nearly every other person I know has tested positive for covid-19 in the last month. Friends, family, and co-workers are getting sick, some being hospitalized as I write this letter. We have had to focus on keeping our 3 year old safe without his ability to get vaccinated. My work and my husband's work have both been impacted and most of all our time has been focused on navigating just getting by right now. I know that my story is not unlike others here in Val Verde who, like me, feel this Draft EIR is very *important* to review but just absolutely do not have the time to properly comment on the report with all that is happening right now.

This community has been put in this position by the Department of Regional Planning before and in the past, the department has allowed extensions so our residents can properly participate. This was largely due to understanding that a low income, majority Spanish speaking community with many essential workers in it will need more time, especially if the comment period is over the holidays, to be able to participate in this process. **I want to emphasize that extensions were given to our community on projects like this before this pandemic.**

I do not feel an extension is a hard request to fulfill so I do hope that Regional Planning will extend the comment period by 120 days AT THE LEAST to accommodate the residents as we navigate a pandemic currently peaking at historical numbers and impacting our lives in a variety of ways.

Please include this letter in the administrative record and provide a confirmation of your receipt of this correspondence.

Response 20-1:

Please refer to *Response 12-1* regarding the comment period.

Please refer to *Response 16-2* regarding traffic and transportation routes.

Please refer to *Response 14-3* regarding topography.

Please refer to *Response 6-2* regarding wildfire and fire hardening.

Please refer to *Response 15-5* regarding land use and population.

Additionally, this comment recommends that signage and notices regarding the Project in Val Verde Canyon be printed in both English and Spanish. All signs and notices have been, and will be, prepared in accordance with the County's current requirements and the CEQA Guidelines.

1-9-22

Mr. Jodie Sackett
Los Angeles Dept. of Regional Planning
320 W. Temple St.
Los Angeles, CA 90012

Sent via email to jsackett@planning.lacounty.gov

Re: Sterling Ranch DEIR **VTPM No. 060257 Hydrology Study**

The developer, Sterling gateway, LLC., hired Sikand Engineering to perform the hydrology study for proposed tract development. The developer also hired Sikand Engineering to perform the Grading and Drainage plan for the same tract. The hydrology study was completed in January 20th, 2020. In this report there is a Existing Condition Map Sheet 1 of 1 in the Appendix that diagrams the drainage paths. There is a gross misrepresentation regarding a concentrated runoff between Lincoln and Chiquito Canyon, titled, 'OUTLET'. This is represented below (Figure 1) in a screen shot of this sheet.

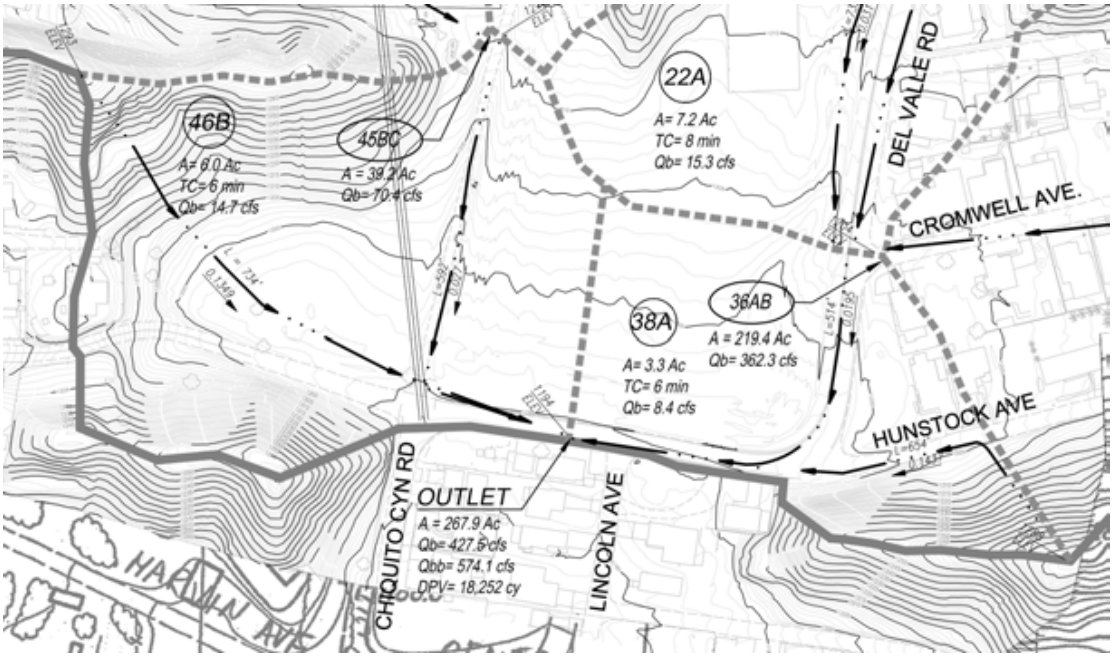

Figure 1

21-1

I'am a Registered Civil Engineer in the State of California, I'am also a 30 year resident of this community and have driven on Hunstock, past this 'Outlet' in every condition. In particular during the winter of 2005 where we had record levels of rainfall. I have never seen or experienced anything remotely close to an 'Outlet' of capacities shown in the data(Qb=427.5cfs). This is manufactured flow. See figure 2 below that shows the correct flow in red.

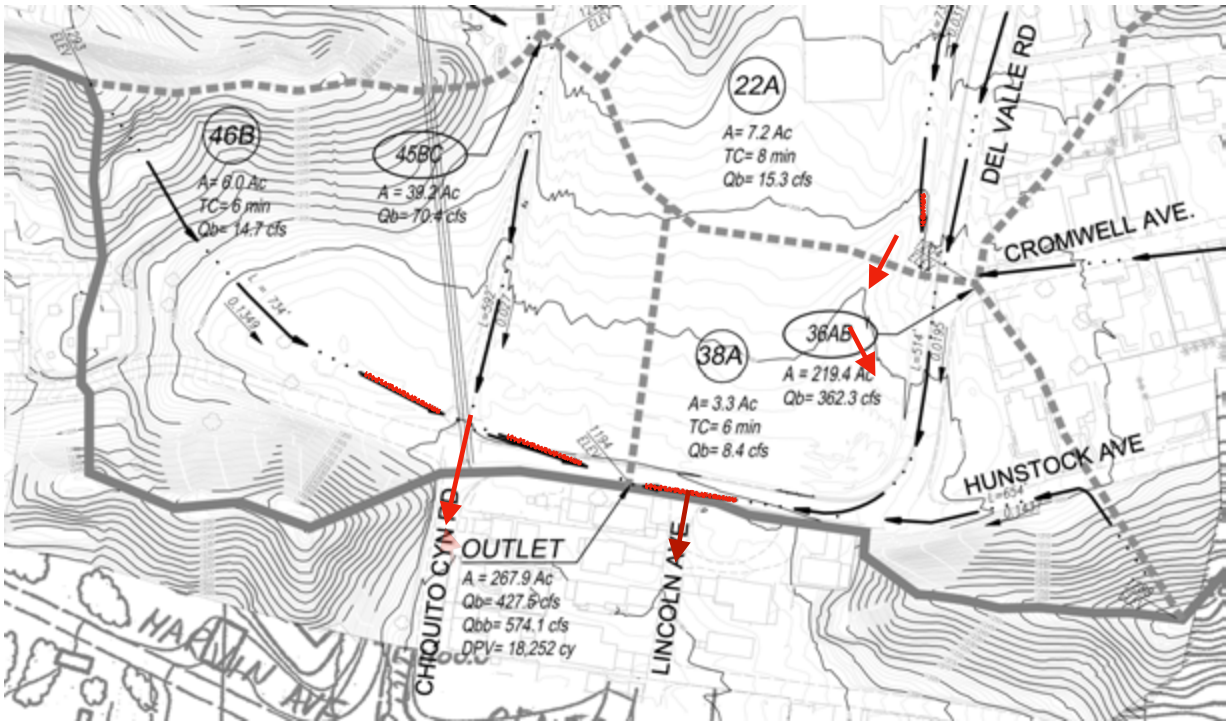

Figure 2

21-1

There is no evidence or proof that such an 'Outlet' exist. Such a concentrated flow would presents itself with evidence of erosion in the form of ruts, gullies or debris runoff. None of these factors are present or provable. The only possibility for such a preposterous display of misrepresentation would be to make an argument for the proposed Infiltration Basin(406A) on the Grading Plan that is designed to overflow and flood Hunstock Avenue. The developer has been presented with 2 options for drainage with the project. 1) Provide post development runoff to an existing storm drainage or 2) Contain onsite. The former option would be costly since the existing natural storm drainage is unimproved and any additional drainage into this channel would require improvements. Since the developer has decided to contain onsite, a concerted effort has been instituted that is both flawed and potentially hazardous. The idea that a new tract development would provide state of the art runoff for the new roads building pads but impact the existing residents and roads with basin flooding is disgusting.

It is the county's responsibility to verify and provide evidence to the members of the Val Verde community that such an 'Outlet' shown on the map exist.

21-2

Frank Miscione, P.E.

COMMENT LETTER NO. 21:

Frank Miscione

Comment 21-1:

The developer, Sterling gateway, LLC., hired Sikand Engineering to perform the hydrology study for proposed tract development. The developer also hired Sikand Engineering to perform the Grading and Drainage plan for the same tract. The hydrology study was completed in January 20th, 2020. In this report there is an Existing Condition Map Sheet 1 of 1 in the Appendix that diagrams the drainage paths. There is a gross misrepresentation regarding a concentrated runoff between Lincoln and Chiquito Canyon, titled, 'OUTLET'. This is represented below (Figure 1) in a screen shot of this sheet.

I'm a Registered Civil Engineer in the State of California, I'am also a 30 year resident of this community and have driven on Hunstock, past this 'Outlet' in every condition. In particular during the winter of 2005 where we had record levels of rainfall. I have never seen or experienced anything remotely close to an 'Outlet' of capacities shown in the data (Qb=427.5cfs). This is manufactured flow. See figure 2 below that shows the correct flow in red.

Response 21-1:

Section 5.9: Hydrology and Water Quality of the Draft EIR analyzes the Project's impacts on hydrology. The "OUTLET" as identified on the map was only provided as a comparison point for existing versus proposed conditions as opposed to identifying an existing physical outlet from a drainage facility. The existing flows do not cross Hunstock as a concentrated point flow but rather as a sheet flow condition. The proposed linear infiltration basin would discharge as a weir over the existing edge of pavement on the north side of Hunstock to match existing conditions. The flow rates pre- and post-Project have been determined based on the LA County Hydrology Manual and are based on the County's design storm. No impacts from the Project associated with flooding on- or off-site would occur.

Comment 21-2:

There is no evidence or proof that such an 'Outlet' exists. Such a concentrated flow would present itself with evidence of erosion in the form of ruts, gullies or debris runoff. None of these factors are present or provable. The only possibility for such a preposterous display of misrepresentation would be to make an argument for the proposed Infiltration Basin(406A) on the Grading Plan that is designed to overflow and flood Hunstock Avenue. The developer has been presented with 2 options for drainage with the project. 1) Provide post development runoff to an existing storm drainage or 2) Contain onsite. The former option would be costly since the existing natural storm drainage is unimproved and any additional drainage into this channel would require improvements. Since the developer has decided to contain onsite, a concerted effort has been instituted that is both flawed and potentially hazardous. The idea that a new tract development would provide state of the art runoff for the new roads building pads but impact the existing residents and roads with basin flooding is disgusting.

It is the county's responsibility to verify and provide evidence to the members of the Val Verde community that such an 'Outlet' shown on the map exist.

Response 21-2:

As discussed in *Response 21-1*, the "OUTLET" as identified on the map was only provided as a comparison point for existing versus proposed conditions as opposed to identification of an existing physical outlet from a drainage facility. No impacts from the Project associated with flooding on- or off-site would occur.

November 29, 2021

Mr. Jodie Sackett- Planner
Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012
Tel: 213-974-6411
jsackett@planning.lacounty.gov

Re: Sterling Ranch Estates Project
TTM 60257, Case # 03-250
SCH Number: 2019080092
Castaic, CA

Dear Mr. Sackett,

We have reviewed the Sterling Ranch Residential project.

It is our understanding, that the project meets the development guidelines of the Castaic Area Community Standards District (CSD) and One Valley One Vision, which we support.
The project will provide many community benefits to the Val Verde area.
In addition to much needed new housing, the project will also upgrade the multi-use trail access, water and sewer services to Val Verde.

We also appreciate the fact that the Developer has agreed, at no expense to the residents, to build, maintain and manage the proposed 3.4-acre Community Park.

The small commercial center will provide residents with much needed and conveniently located commercial services as well.

Lastly, we look forward to Del Valle Road being brought up to current, safe LA County Road standards.

Should you have any questions, please feel free to contact me.

22-1

Sincerely,

Carlos P Rodriguez
31513-31514 San Martinez Road
Castaic, CA 91384
(818)612-4086

COMMENT LETTER NO. 22:

Carlos Rodriguez
31513-31514 San Martinez Road
Castaic, CA 91384

Comment 22-1:

We have reviewed the Sterling Ranch Residential project.

It is our understanding, that the project meets the development guidelines of the Castaic Area Community Standards District (CSD) and One Valley One Vision, which we support.

The project will provide many community benefits to the Val Verde area.

In addition to much needed new housing, the project will also upgrade the multi-use trail access, water and sewer services to Val Verde.

We also appreciate the fact that the Developer has agreed, at no expense to the residents, to build, maintain and manage the proposed 3.4-acre Community Park.

The small commercial center will provide residents with much needed and conveniently located commercial services as well.

Lastly, we look forward to Del Valle Rode being brought up to current, safe LA County Road standards.

Should you have any questions, please feel free to contact me.

Response 22-1:

This comment expresses general support for the Project and cites some of the Project's features. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration. This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no further response is necessary.

From: Shirley Reifer <shreifer@yahoo.com>
Sent: Friday, January 21, 2022 10:13 AM
To: Jodie Sackett <jsackett@planning.lacounty.gov>
Cc: Barger, Kathryn <Kathryn@bos.lacounty.gov>
Subject: Sterling Ranch Estates

Dear Sir,

I own a lot in Val Verde near the Sterling Ranch Estates. I need to find out how this will affect my lot on Taylor Street. The property is at lower elevation than this project. I Have been trying for a month to reach someone to get clarity, and have had no luck and no response. 23-1

Please contact me at 626-287-1395 home, 626-616-1965 cell or shreifer@yahoo.com.

Sincerely,
Tom Reifer

COMMENT LETTER NO. 23:

Tom Reifer

Comment 23-1:

I own a lot in Val Verde near the Sterling Ranch Estates. I need to find out how this will affect my lot on Taylor Street. The property is at a lower elevation than this project. I Have been trying for a month to reach someone to get clarity, and have had no luck and no response.

Response 23-1:

The Project's hydrology impacts are discussed in Section 5.9: Hydrology and Water Quality of the Draft EIR. Based on substantial evidence, the Draft EIR concluded the Project's hydrology impacts would be less than significant. As Taylor Street is 0.25 miles south of the VTTM site, and is not adjacent to the Project site, there will be no effect to the commenter's property on Taylor Street.

LAW OFFICES OF

DALE VAN CAMP

23901 CALABASAS ROAD, SUITE 1063
CALABASAS, CALIFORNIA 91302-1542
POST OFFICE BOX 17675, ENCINO, CA 91416-7675

Telephone: 818-783-8421 DaleEsq@socal.rr.com Facsimile: 818-996-1946

November 17, 2021

Mr. Jodie Sackett, Senior Planner via US Mail & email (jsackett@planning.lacounty.gov)
Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012

Re: Sterling Ranch Estates Project
TTM 60257, Case # 03-250
SCH Number: 2019080092
Castaic, CA

Dear Mr. Sackett:

I am writing on behalf of my clients, substantial landowners in the Val Verde area for decades. We write in favor of approval of the Sterling Ranch Estates Project referenced above.

My clients' ancestors have owned land in this area (now over 300 acres) for over 100 years. They care deeply about the area and its future. They are keenly aware of the need for housing and development. This is why they, and I, look forward to this project. It will provide critically needed single-family housing to the area. This is the right project at the right time.

I have, for the sake of my clients, reviewed the publicly-available documents pertaining to this project. I have spoken with the principal at Sterling Ranch Estates, Hunt Williams. It is our understanding that the project meets the development guidelines of the Castaic Area Community Standards District (CSD) and One Valley One Vision, which we also support. 24-1

We strongly believe the Sterling Ranch Estates Project will also provide much-needed additional benefits, such as a community park, hiking trails, a small retail center and new upgraded roads to the Val Verde area. I am keenly aware of the pending addition of a new 1,000,000-gallon water/fire suppression storage tank for the area. This is all great news for the community and for Los Angeles County in general. We urge your approval.

I would be happy to answer any questions, so please feel free to contact me.

Sincerely,

DALE VAN CAMP

COMMENT LETTER NO. 24:

Dale Van Camp

Comment 24-1:

I am writing on behalf of my clients, substantial landowners in the Val Verde area for decades. We write in favor of approval of the Sterling Ranch Estates Project referenced above.

My clients' ancestors have owned land in this area (now over 300 acres) for over 100 years. They care deeply about the area and its future. They are keenly aware of the need for housing and development. This is why they, and I, look forward to this project. It will provide critically needed single-family housing to the area. This is the right project at the right time.

I have, for the sake of my clients, reviewed the publicly-available documents pertaining to this project. I have spoken with the principal at Sterling Ranch Estates, Hunt Williams. It is our understanding that the project meets the development guidelines of the Castaic Area Community Standards District (CSD) and One Valley One Vision, which we also support.

We strongly believe the Sterling Ranch Estates Project will also provide much-needed additional benefits, such as a community park, hiking trails, a small retail center and new upgraded roads to the Val Verde area. I am keenly aware of the pending addition of a new 1,000,000-gallon water/fire suppression storage tank for the area. This is all great news for the community and for Los Angeles County in general. We urge your approval.

I would be happy to answer any questions, so please feel free to contact me.

Response 24-1:

This comment expresses general support for the Project and cites some of the Project's features. The comment is noted for the record and will be forwarded to the decision makers for review and consideration. This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no further response is necessary.

4.0 RESPONSES TO ORAL TESTIMONY

A. INTRODUCTION

The County of Los Angeles Hearing Examiner held a virtual public hearing on December 14, 2021 to accept comments on the Draft EIR. The County of Los Angeles Department of Regional Planning (LACRP) provided notice of the hearing through a variety of means pursuant to the provisions of County Code Sections 22.60.174 and 22.60.175, including: (1) signs posted on Del Valle Road approximately one-quarter mile north of Hunstock Street and Hunstock Street at Chiquito Canyon Road; (2) the electronic posting on the County Department of Regional Planning website of the Notice of Hearing Examiner Public Meeting Notice of Completion and Availability of the Draft Environmental Impact Report on November 10, 2021; and (3) notifications sent via mail and email to: (a) all persons, organizations, and agencies who requested notification or who previously commented on the Project; (b) identified stakeholders in the surrounding area such as homeowners groups, business associations, and local environmental organizations. The Hearing Examiner held the hearing on day 33 of the 60-day public comment period on the Draft EIR that began on November 11, 2021, and ended on January 10, 2022.

Holding a public hearing by the County Hearing Examiner at a location in proximity to a proposed project site is a recently enacted procedure for development projects within the County intended to provide increased opportunities for public input, particularly for those members of the public who live or work in proximity to the project or are otherwise considered stakeholders in the project area.

At the Hearing Examiner public hearing, the general public was invited to provide oral comments regarding the Draft EIR and the Project, the transcript of which is included and responded to in this section. The nine members of the public identified below provided oral comment at this hearing:

1. Terry Hara
2. Sara Olaguez
3. Sue Hernandez
4. Rick Sawyer
5. Timothy Williams
6. Arthur Lopez
7. Leah Whitaker
8. Mo Chaudhary
9. Rosana Paladin

As the comments presented herein were taken from the Zoom Closed Caption transcript of the meeting, grammatical and other errors have not been denoted.

B. RESPONSES TO COMMENTS RECEIVED DURING THE HEARING EXAMINER HEARING ON DECEMBER 14, 2021

Los Angeles County Department of Regional Planning
Hearing Examiner Meeting
Sterling Ranch Project Draft EIR
December 14, 2021

Gina Natoli: This Tuesday 14 December 2021 Hearing Examiner meeting is called to order. We begin our meetings in the County with a pledge of allegiance. I would like to ask that at this time you arise as you are able and join me in the pledge. I pledge allegiance to the flag of the United States of America, and to the republic for which it stands, one nation under God, indivisible, with liberty and justice for all.

Good evening, I am Regional Planning staff member Gina Natoli. I am the Hearing Examiner on all agenda items tonight. I'd like to go through a few administrative items before we begin the meeting. There are agendas for tonight's proceedings available on Regional Planning's webpage for this meeting, under the heading downloads. All documents submitted for this hearing are available on Regional Planning's webpage, for tonight's hearing, under the agenda item for the Project.

There are established time limits for testimony on Hearing Examiner agenda items, subject to the Hearing Examiner's discretion. Applicants have up to 15 minutes for the initial presentation, and up to ten minutes for rebuttal period. All others will be allowed three minutes each and there is no ceding of time.

Hearing Examiner meetings may be watched via Zoom, Facebook, or YouTube. Links to these platforms may be found on Regional Planning's webpage for each Hearing Examiner meeting. Anyone wishing to provide verbal testimony today on any agenda item and that includes the public comment period, must utilize zoom or your phone. For Zoom please go to the chat box. Provide the agenda item number, your full name, your e-mail address, whether you're the applicant and whether you support or oppose the project.

If you're calling in by phone please first e-mail to comment@planning.LAcounty.gov. Provide the agenda item number, your full name, an e-mail address where we can contact you and your phone number. Also, whether you are the applicant and whether you support or oppose the project. This information is also available on the agenda and Regional Planning's webpage for each Hearing Examiner meeting.

All participants' microphones will be muted during the meeting unless you are providing testimony. When your name is called to provide testimony, your microphone will be unmuted, you will be sworn in, and then given the opportunity to speak. Please remember that our online Hearing Examiner meetings are conducted in the same orderly manner as our in-person Hearing Examiner meetings disruptive individuals may be muted

Our Hearing Examiner meetings are streamed live, but there is also an audio and video recording being made of tonight's proceedings which will be available on Regional Planning's website within 5 days.

The general procedure for tonight's hearing is as follows. First staff will make the brief presentation. Then the applicant or owner will speak, and then I will call all others to speak. If necessary, I will then hear rebuttals by the applicant or owner. Per County Code, the Hearing Examiner makes no decisions. The Hearing Examiner administers the meeting, takes testimony, and reports the testimony to the decision maker. In this case that is going to be the Regional Planning Commission.

Per public hearing notice, this public hearing to take testimony on the Sterling Ranch Project's Draft EIR will be, is to take, tonight's hearing is to take testimony on the Sterling Ranch Project's Draft EIR. Public hearings on the Project itself will be scheduled before the Regional Planning Commission at a future date.

That Regional Planning Commission hearing will be noticed in accordance with County of Los Angeles regulations. If you would like to receive a notice of that hearing please provide your contact information to Mr. Jodie Sackett, the Case Planner for the Project, via e-mail. Also, per the public hearing notice, testimony will be taken tonight until the last person has spoken, or until 9:00 p.m., whichever comes first.

Alright, with that we're moving onto Part II, public meeting for Project 03-250-(5) request for a 222 single-family resident lot subdivision and associated improvements in the Val Verde community. Mr. Sackett please proceed.

Jodie Sackett: Yes, good evening, Hearing Examiner. My name is Jody Sackett and I'm Senior Planner in the Subdivision Section of the Department of Regional Planning, and I'm going to share my screen for my presentation.

Okay. Tonight's meeting is regarding a Notice of Availability and completion of Draft Environmental Impact Report for Project No. 03-250-(5), Sterling Ranch Estates Project. It is located in the unincorporated community of Val Verde. The applicant for this Project, Sterling Gateway, LP, represented by the owner, Hunt Williams.

Project description. This Project is residential tract subdivision of land. It primarily consists of 222 single-family lots on 113-acres. There are off-site improvements. Off-site improvements contribute approximately 50 additional acres. The offsite improvements include a 1-million-gallon water tank, upgrading a water line, a new sewer line, highway improvements, a trail easement, and an open space conservation easement. The offsite open space conservation area, that constitutes the easement, is approximately 38 acres.

Entitlements. The project consists of four entitlements. There's the subdivision of land, which is the vesting tentative tract map, 222 single-family lots, 7 open space lots, 7 public facility lots, 6 HOA landscape lots, 2 private park lots, 2 access road lots, 1 street lot, and 1 commercial lot for a total of 247 lots. There's also Conditional Use Permit for urban hillside management review, onsite grading, and offsite water and wastewater facilities. There's no tree permit for removal of 14 oaks and encroachment into the protected zone of 11 oaks. And there's a proposed highway realignment of Del Valle Road.

The Project location is shown on this map. The Project boundaries, proper, are indicated in red, and to the south of the project the existing Val Verde community can be seen.

The closer up aerial image shows the existing Project site, and also again shows the existing community of Val Verde to the south. It is important to understand the entire physical scope of this Project. Starting from the right-hand side to the left-hand side of this photo, you can see this purple line which represents the offsite water line area. This constitutes one of the components of the offsite improvements that are proposed with the Project. And just a little bit further to the east of this water line, proposed, just for map reference, geographic reference, this is the Interstate 5 freeway. Coming down to this blue area, this is the area of the offsite grading and highway improvements that are proposed. This yellow area is the subdivision, is the boundary of the subdivision, Project proper. To the south this green area is the proposed 38-acres of conservation easement. And then lastly, all the way to the west this area here, shows the offsite water tank area.

This is a conceptual site plan of the Project. You can see these white areas constitute the single-family lots and street system within the Project. The green area around the lot constitutes the Fuel Modification Zone, the close-in landscaping areas that are just outside the single-family lots. The yellow areas are another Fuel Modification Zone that primarily constitute the graded slopes of the project. These brown areas are areas that will remain natural and undisturbed. The pink area is the proposed private community park that will be accessible to the public. And the blue area below that is water quality control basin. And I just want to point out this white area to the west of the water quality basin is the commercial lot site.

The summary of significant impacts. The Draft Environmental Impact Report concluded there would be significant and unavoidable impacts to the area of Transportation. Specifically, the project will exceed established regional thresholds for residential VMT, vehicle miles traveled, at 34.2, versus the threshold of 18.6 for the North County, and 24.1 vehicle miles traveled for the Santa Clarita Valley Planning Area. Two areas of environmental review did not require analysis. Those areas are Agriculture and Forestry Resources, and Mineral Resources.

Site photos. Photo No.1, as shown on the previous photo feed, is a view looking north from Coolidge Avenue, which is the street that currently abuts the existing Val Verde Community and is directly adjacent to the subject property. Viewpoint 2, below. This is a photo from the east, I'm sorry, from the west of the subject property, looking east towards the subject property. Photo 3 is a view looking southwest along Del Valle Road. And Photo 4 is a viewpoint that is a ways off of the actual Project site, looking west towards the VTTM site, which is the vesting tentative tract site.

New public comments received. Since the writing of staff's report two additional comments were received. One comment from LAFCO, the Local Agency Formation Commission of Los Angeles County, which commented that the Final EIR should address any potential annexations. And lastly a letter of support from Mr. Carlos Rodriguez. And this will conclude staff's presentation. Thank you.

Gina Natoli: Thank you Mr. Sackett. I just had one question for you. Does the amount of disturbed area calculated include any off-site fuel modification that will be required for the residents?

Jodie Sackett: The area that is shown here on this plan includes all of the fuel modification areas. So, this could be included in the total project acreage, which is 113 acres plus the 50-acres of offsite improvements, which would include the areas of the field modification. So, 163-acres.

Gina Natoli: So, the offsite improvements for any fuel modification for Zones A, B, or C, that acreage is included in that 50-acres?

Jodie Sackett: Well, that's a good question. For example, regarding the offsite water tank area, we may need to ask the applicant, because I'm not sure if the area that's being graded and approved for the offsite water tank area would include all the fuel modification area.

Gina Natoli: I'm also thinking for the vesting tentative tract map itself in addition to the water tank, just something to keep in mind for the final…

Jodie Sackett: …Correct…

Gina Natoli: …that that be included and broken down by fuel modification zone. It could be helpful to show what might need to be irrigated if it's offsite and what might able to be just far out in the zone… [unknown].

Jodie Sackett: Very well. Thank you.

Gina Natoli: All right. Thank you very much. With that, Mr. Huntington, could we hear from the applicant please for their presentation.

Josh Huntington: Thank you Madam Hearing Officer. Yes, the applicant is present.

Gina Natoli: Very good. At this time, if we could have Mr. Huntington swear you in, if you're prepared to do that Mr. Huntington. Are you prepared to do that or would you like me to?

Unknown: You can do that.

Josh Huntington: Yes, thank you very much. Go ahead and swear in the applicant Madam Hearing Officer.

Gina Natoli: That didn't sound like Mr. Huntington. Thank you for the clarification. And let's see, who would that be Mr. Huntington? Who will be speaking for the applicant?

Josh Huntington: Thank you Madam Hearing Officer. I believe that is Hunt Williams. Hunt is that you?

Hunt Williams: Yes, can you hear me?

Josh Huntington: We can hear you.

Hunt Williams: Oh great.

Gina Natoli: Mr. Williams, who else on your team may be providing testimony tonight?

Hunt Williams: I have got my entire entitlement team here. My land use attorney, Kathleen Truman. My EIR consultant from Meridian, Tony Locacciato. My civil engineer, Raman Gaur, from Sikand Engineering. I've got Darryl Zerfass from Stantec, he's our traffic engineer, and I've got Heather Moine, who's the biologist from Dudek. They're all here to support me on this call.

Gina Natoli: Alright. What I'm thinking is do you plan to be the only one doing the initial presentation and the others are available for answering questions?

Hunt Williams: Yes.

Gina Natoli: Alright. Let's start with you Mr. Williams and then if others need to testify, I can swear them in at that time. So please Mr. Williams if you would raise your right hand. Do you swear or affirm under penalty of perjury that the testimony you may give in the matter now pending before this Hearing Examiner shall be the truth, the whole truth, and nothing but the truth?

Hunt Williams: Yes.

Gina Natoli: Thank you very much Mr. Williams. Please, and I ask everyone if you could just state your name for the record before you begin. Mr. Williams, please proceed.

Hunt Williams: Thank you Gina, and thank you Jodie, and thanks everybody for coming on the call tonight. My name is Hunt Williams. I'm the General Partner for the Sterling Gateway Family Partnership. If you want to flip the next slide. One more slide please.

My grandfather, Ted Sterling, shown here on the Sterling Ranch property in the early 60's, was a pioneer to the Santa Clarita Valley, and started coming out to Santa Clarita 1940's. He discovered the cascade oil field 1949, which at the time was one of the largest oil discoveries in California. This property has been in our family for many generations. Flip to the next slide please.

This is an aerial showing proximity of our property to the surrounding development. As Jodie mentioned to the far right, you'll see the I-5 freeway and the I-126 freeway to the south, going west to Ventura. The Project is located approximately 1.5 miles from the intersection of I-5 freeway and Hasley Canyon, and approximately 2 miles to the south is the intersection of Chiquita Canyon and Highway 126. If you look immediately to the right of the property, you'll see a large industrial park. This is the, we are within 500 feet of the Valencia Commerce Center, which is now the largest industrial park in LA County. To the south of the Project, you'll see a pink line. This represents the boundary of the Newhall Ranch Project, which is located within a half a mile of our Project. You can skip to the next slide please.

This is a great map. This is an illustrative study of our site, our Project, and the significance of this is, it shows the consistency with the Castaic Area Community Standards District, which was fully approved and adopted by LA County in 2004. In the map you see lots that are shaded in yellow, which represent lots that are minimum of 7,000 square feet to 10,000 square feet. The lots in orange are lots that are 10,000 square feet or greater, and pursuant to the CSD, we could have no more than 43% of our lots under 10,000 square feet. So, in other words, the average lot size for our project is over a quarter of an acre. Over 11,400 square feet, per lot, and so, this shows, this shows kind of the consistency. Our project has been consistent with the CSD since 2004. We've made no significant changes to the plan and the lots plan since that time. In, real quickly, you can see the other components of the project, the park, the commercial center, the storm water management areas, as well, and then the open space to the south there, that shows the open space, and just one quick question, you'll see a green line going through that open space. That's a multi-use trail easement that's on the Santa Clarita Master Trail Plan that we work with LA County and Castaic, to create a multi-use trail which will allow residents to access this pristine, public conservation easement area. You can slip to the next slide please.

Through our community outreach for many years, the local community indicated strong interest and desire to have some additional local commercial services to help the local community and residents. So, we designed this center, which is about 20,000 square feet, which will allow residents to stay

local, stay out of their cars, and have local community services, commercial services, to the local community. You can flip to the next slide.

This is the rendering of the commercial center, which was also fully supported and approved by the Castaic Area Town Council. You can flip to the next slide please.
These are sample home renderings of the Project. The Project will provide large lots, which will allow us to build single story homes with views. We'll be able to have multi-generational and mother-in-law housing, in-home offices, and large backyards for kids to play in. Flip to the next slide please.

These are samples of the house. We anticipate houses to have front porches, a variety of designs, and single story. Anyways. Next slide please.

This is a rendering of the site, showing the park and the detention basin. This is the entry feature that everybody will see when they drive into the property. We're planning to fully align and reconstruct Del Valle Road, which will include a new portion of the road, which will be Sterling Parkway, which shows here on the left, but this is what the view will look like from that intersection of Chiquito Canyon, Del Valle Road and Hunstock, looking up at the project, and you can see ridge lines behind the project and the open space. Go to the next slide.

I've been working on this project for over twenty years with our family, and we've had an extensive community outreach, I'm very proud of. We've had written support of the Castaic Area Town Council three times in the last twenty years. We've worked extensively with LA County Regional Planning, the 5th District, Parks and Rec, Water Works 36, Public Works, and the others listed here to fully vet this Project, and I think we've done a great job of covering every aspect, and impact, and potential mitigation required for the Project. Next slide please.

So, the benefits of the project are significant. First off, we're providing a 3.5-acre park for the Val Verde community. This Project, our family, will be donating this land, and the park will be built, maintained, and managed by the developer and/or HOA at no expense to the Val Verde Community, but it will be open to the public. We've got a 2.5-acre commercial center, that I mentioned before. We are going to be permanently dedicating 37-acres of additional open space land to MRCA, and this will be added to the over 40-acres that they already have under management. So that total open space will be close to 90-acres.

As I mentioned before we'll have a trail dedication creating a critical link in the west side of the trail system on the west side of the I-5. This is a critical component that will ultimately connect the Equestrian Center with Chiquito Canyon on down to Highway 126, which is the master plan for LA County.

We'll be reconstructing Del Valle Road up to current standards, make it safe for everybody to travel in and out of Val Verde. We're going to have enhanced circulation for the existing Val Verde Community by connecting Lexington into the existing community. And big benefit we're going to be building a 1-million-gallon additional fire suppression storage tank, which will serve the existing Val Verde Community in the event of fire. This is a fire suppression, water tank.

And then also we're going to be providing community wireless and Internet at the commercial site, and the park, free for the community to enjoy. And you know the biggest thing is that this project will provide much needed new housing in this area to support the tremendous job growth created by the Valencia Commerce Center, which is now the largest industrial park in LA County. Next slide please.

This is my grandfather on the property back in 1949. And I'm very happy and thankful that you've given me this opportunity to speak tonight. And I've got my entitlement team here for any questions that you may have. And I thank you for your time tonight.

Gina Natoli: Thank you Mr. Williams. Is there any other member of the Sterling Ranch team who would, Sterling Gateway team, who would like to add any comments at this time?

All right. Hearing none, I'm going to need the assistance at least of Mr. Huntington, perhaps of either, I don't know, Kimberly or Jessica or Rafael. I don't know who's keeping track of who's signed up to speak, but I don't see that. So, I need to know who will be calling out the speakers.

Josh Huntington: Madam Hearing Officer, this is Josh Huntington. And I believe Kimberly is prepared to call out speakers and swear in. Is that right Kimberly?

Kimberly: Yes, I can do that.

Josh Huntington: Thank you so much.

Gina Natoli: Yes, thank you very much Miss Soo (Sue or Soh), I appreciate that. So, if you could please call our first speaker.

Kimberly: Yes, our first speaker is Terry Hara, and I will swear them in. Do you swear or affirm under penalty of perjury that the testimony you may give in the matter pending before this Hearing Examiner shall be the truth, the whole truth, and nothing but the truth?

Terry Hara: Yes, I do. Hi. Thank you.

Kimberly: Please state your name for the record and you have three minutes.

Terry Hara: Hi. Yes, my name is Terry Hara. I am…

Gina Natoli: Please go ahead.

Terry Hara: You can hear me alright. Okay.

Gina Natoli: Absolutely.

Terry Hara: So, thank you Hunt for your, it was great to see everything. I am a resident of Val Verde, and I'm not opposed to this project. I just have a few clarification questions. One is the commercial property that you are incorporating into your development, is that maintained by the HOA? Will that be owned by somebody separately? Will it be for sale? Things of that nature. Is it independently owned, is my question? And my second question is about the water tower. Mr. Huntington mentioned, I forget who it was, but they said it was going to be west. Is that up San Martinez? If it is, how far up? That starts to affect me because I'm at the top. I'm just wondering where that giant water tank will be sitting. Gosh, what else was there? I think that's it. Thank you. 1-1

Gina Natoli: Thank you Miss Hera. I will ask Mr. Williams if you can answer Miss Hara's questions now or one of your team can answer that.

You are muted.

Hunt Williams: Can you hear me?

Gina Natoli: Yes, now I can hear you.

Hunt Williams: Yeah. Thanks Terry. Nice to hear from you. So, the commercial center is part of the Project that we are going for approval on. It is a component of the Project. We own the commercial site, and the plan at this point is that that site will be developed by us and/or a developer. The reality is the commercial center will probably need to have some rooftops to support it. So, we anticipate the commercial center will probably come, maybe a little after we start seeing some homes because we don't want to build a commercial center and have nobody, no rooftops, to support it, but it is owned by our family and it's part of the Project.

Terry Hara: So, you'll be doing the leasing to the business that come? 1-2

Gina Natoli: No back-and-forth folks. No back-and-forth.

Terry Hara: My apologies.

Gina Natoli: That's quite alright Ms. Hara, that's quite alight.

Hunt Williams: Yeah, so, relative to the water tanks, so the water tank is up, right now there's an existing, LA County Waterworks has the existing water work farm, it's the Kiama Water Tank Farm. It's up, at the end of San Martinez, through a private

gate, up another, probably quarter of a mile, up into some open space. There's a million-gallon tank and a 600,000-gallon tank there now. And we're going to be building an additional 1-million-gallon tank directly adjacent to the existing Kiama Tank Farm. So, the impacts will be minimal to residents because it's way up far, up in the canyon at an elevation that supports the necessary fire flow requirements.

Gina Natoli: Thank you very much Mr. Williams. I appreciate that. Okay, if we could have our next speaker, and I need to ask, I'm not sure who's muting and unmuting our speakers, but once an individual has had a chance to speak, please make sure that they are re-muted. Miss Soo, please proceed with our next speaker.

Kimberly: Next, we have Sara Olaguez. Do you swear or affirm under penalty of perjury that the testimony you may give in the matter pending before this Hearing Examiner shall be the truth, the whole truth, and nothing but the truth?

Sara Olaguez: Yes, I do.

Kimberly: Thank you. Please state your name for the record and you have three minutes.

Sara Olaguez: My name is Sara Olaguez, and I, in general I oppose this Project because I worry that it will take away from the integrity of the history of Val Verde in general. So, the actual town of Val Verde has a pretty amazing history that I worry will get lost with this development and all of these big new houses coming in. That's all I have to say.

1-3

Gina Natoli: Thank you Miss Olaguez for your comments. I just want to remind folks that tonight is about the Draft EIR. There will be multiple, multiple opportunities to speak on the merits of the Project itself, particularly before the Planning Commission, and I'm sure this needs to go to the, I'm not sure, I'm assuming Mr. Huntington this will need to go to the Board of Supervisors is that correct?

Josh Huntington: That is correct Madam Hearing officer.

Gina Natoli: Several different opportunities to address decision makers on the actual merits of the Project, but I do appreciate your comments, Ms. Olaguez. Miss Soo if we could have our next speaker, please.

Kimberly: Next, we have Sue Hernandez. Do you swear or affirm under penalty of perjury that the testimony you may give in the matter pending before this Hearing Examiner shall be the truth, the whole truth, and nothing but the truth?

Sue Hernandez: Yes.

Kimberly: Thank you please state your name for the record, and you have three minutes.

Sue Hernandez: Sue Hernandez. I'm wondering about the impact this Project will have on those houses on Silver Street which butt up against it.

1-4

Gina Natoli: Did you have any other concerns, Ms. Hernandez?

Sue Hernandez: No.

Gina Natoli: And by impact of the Project on the houses on [Silver Street], what specifically was your concern about impacts? Was it traffic? Was it noise? What is your concern.

Sue Hernandez: Well, I live on Silver Street. I wanted to know, will you be able to see the houses from Silver Street? How far up to the top of the hill will it go? Will there be sewer lines available for the people on Silver Street, also? And that's it.

1-5

Gina Natoli: Very well. Thank you, Miss Hernandez. Mr. Williams, can you respond to those concerns? If there would be aesthetic impacts to the houses on Silver Street, and if there would be an expansion of the opportunity to hook up to a sewer line?

Hunt Williams: Can you hear me?

Gina Natoli: Yes, sir.

Hunt Williams: Okay, so we, first of all, the visibility from Silver Street. I don't believe you're going to be able to see any of the homes. We, one of the things we did with our outreach is, we pulled back the homes to the north. Silver Street lies below a protected ridgeline that we're leaving natural, and I don't believe you're going to be able to see any of the homes. We pulled the homes back a little bit further so they're away from the edge of the ridgeline. So, I don't believe you're going be to having any impact.

Relative to sewer, we have an approved Sewer Area Study for the Project. At this time the plan is to connect to the sewer system which exists at the intersection of Hasley Canyon and Del Valle Road. The sewer line will run along Del Valle Road through the Project down to Hunstock. At this point in time there is no plan to extend sewer into the surrounding neighborhood of Val Verde.

Gina Natoli: Thank you Mr. Williams. Ms. Soo, could we have our next speaker please.

Kimberly: Yes. Next, we have Rick Sawyer. Do you swear or affirm under penalty of perjury that the testimony you may give in the matter pending before this Hearing Examiner shall be the truth, the whole truth, and nothing but the truth?

Rick Sawyer: Yes, I do. Yes.

Kimberly: Thank you. Please state your name for the record and you have three minutes.

Rick Sawyer: Okay. My name is Rick Sawyer and I'm a property owner in the Val Verde area. I just wanted to let you know that I've read the Draft EIR, and I think that it pretty much covers almost everything that I would think you could come up with as far as the property is concerned. I appreciate that the County has done a thorough review of the reports and studies for the Project. I think, you know, this has been a long time coming and I think the Project fits, shoehorns, right into that space perfectly. I think that the surrounding homes will probably be, the value, will probably be going up because the newer homes, of course people coming in and everything. So infused energy into the Project. I look forward to the new park that will be created. I think that will be great open space for people to go and get down there play a little soccer and have families come down to an area that right now in Val Verde there's not a lot of areas other than up by the swimming pool, whatnot. So, this is a new area that will be created for people to kind of have a chance to get out there, and the open space and conservation easement is pretty cool. You know, with hiking trails that go throughout. You know there's a lot going on with this Project that's going to help the area, especially the water. It has, I think it has, plenty of water. Million-gallon tank for fire suppression, and all that. So, I support the Planning Commission approval as you get to that point. And thank you for all your efforts. And that's about all I have to say at the moment.

1-6

Gina Natoli: Thank you Mr. Sawyer. Ms. Soo, can we have our next speaker please.

Kimberly: Yes. Next, we have Arthur Lopez. Do you swear or affirm under penalty of perjury that the testimony you may give in the matter pending before this Hearing Examiner shall be the truth, the whole truth, and nothing but the truth?

You would have to unmute yourself from your end.

Gina Natoli: Mr. Lopez, oh there we go.

Mr. Lopez, can you hear us?

Mr. Lopez, we can't hear you. If you can maybe try muting and unmuting yourself again.

Alright, tell you what. Ms. Soo let's go on to the next speaker, and then we will come back to Mr. Lopez.

Kimberly: Yes. Next speaker is Timothy Williams. Do you swear or affirm under penalty of perjury that the testimony you may give in the matter pending before this Hearing Examiner shall be the truth, the whole truth, and nothing but the truth?

Timothy Williams: I do.

Kimberly: Please state your name for the record and you have three minutes.

Timothy Williams: My name is Tim Williams, a long-term resident of Val Verde.

Gina Natoli: Mr. Williams if you have two speakers on…

Timothy Williams: …Yes…

Gina Natoli: …please turn off the one you are not speaking into, because we're getting some echoing and feedback.

Timothy Williams: Yes. That was…

Josh Huntington: That's much better. Thank you.

Gina Natoli: Yes, that's perfect. Thank you. Please proceed Mr. Williams.

Timothy Williams: I'm a long-time resident of Val Verde since 1959. And this project just like Sara Oleguez said would be a disaster for the integrity of the history of Val Verde. Because we've been, have a rich history and these homes would be like a definitely overdevelopment and massive traffic. Sewer system as you said it's only going up to Hunstock and Del Valle, but not for the rest of the community. So, we've been kind of, plus I sit on the Board, and we've been against this project for some time now. And I don't see the benefits for our community whatsoever. Mr. Hunt came up to the park for a meeting a few years ago and I asked a question about the sewer system, which I never got an answer for. And I live on Del Valle at this present time. Just looking out the door just looking out the community is fine, but this project just would disrupt our history and our landscape. That's about it. 1-7

Gina Natoli: Mr. Williams, I just have one question for you. You said you sit on the board. Which board do you sit on?

Timothy Williams: Well, I created the Val Verde historical society, and that board.

Gina Natoli: Alright, great, thank you very much Mr. Williams, I appreciate it. Ms. Soo let's see if we can go back and hear from Mr. Lopez, Mr. Arthur Lopez.

Arthur Lopez: Hello. Can you hear me now?

Gina Natoli: Yes.

Kimberly: Would you like me to swear him in again?

Gina Natoli: Please, yes.

Kimberly: Okay. Do you swear or affirm under penalty of perjury that the testimony you may give in the matter pending before this Hearing Examiner shall be the truth, the whole truth, and nothing but the truth?

Arthur Lopez: Yes.

Kimberly: Thank you. Please state your name for the record and you have three minutes.

Arthur Lopez: Arthur Lopez.

Gina Natoli: Go ahead Mr. Lopez.

Arthur Lopez: I've been a resident since 1989 here in Val Verde, and I enjoy it very much and I appreciate all the work that this Planning Commission is putting together. I notice there's going to be Internet access provided, wireless. Can there also be cell phone access provided? Because right now if you're on Del Valle Road in your car, it ceases to function. There's no way to call for AAA or anything around this area via cell phone. So, I just wanted that to be added a as a consideration for safety. That's all.

1-8

Gina Natoli: Thank you Mr. Lopez. I'm not sure that's something Mr. Williams should address, or perhaps Mr. Huntington or Mr. Sackett, you could address that.

Jodie Sackett: Well, that might be something that we have to look into, if that's, we can ask the developer about that, but most likely it may be something that is a zoning issue in terms of where facilities, cell facilities, can be located, etc. So that's something that staff can look into.

Hunt Williams: Gina, can you hear me?

Gina Natoli: Yes, who is this?

Hunt Williams: Yes, Hunt Williams. The applicant.

Gina Natoli: Go ahead Mr. Williams.

Hunt Williams: So, just real quickly. So, just one item of clarification with you and Josh. The Project is not required to go to the Planning Commission, or excuse me the Board of Supervisors, is a Planning Commission approval. So just for the record I just wanted to clarify that that it's a Planning Commission approval, not the Board of Supervisors.

Josh Huntington: Thank you Hunt. Madam Hearing Officer I was going to correct that in a minute.

Hunt Williams: Yeah, as far as Internet, internet will be provided. As far as cell tower service, I believe that there's an application that's active within the County to place a cell tower facility in the Val Verde area. I'm not sure exactly what the status is, but I've seen some information. I believe there's an application that has circulated for a cell tower in the area.

And then just real quickly on Mr. Williams with the history. We propose to have a history center in the park, and we would love to work with him, and his group, to incorporate the history of Val Verde in our proposed little history center, we're proposing, in the park we're going to be building and that's all.

Gina Natoli: All right. Thank you, Mr. Williams, for addressing that question. Miss Soo, could we have our next speaker please.

Kimberly: Yes. Next is Leah Whitaker. Do you swear or affirm under penalty of perjury that the testimony you may give in the matter pending before this Hearing Examiner shall be the truth, the whole truth, and nothing but the truth?

Leah Whitaker: Yes, I do.

Kimberly: Thank you. Please state your name for the record and you have three minutes.

Leah Whitaker: My name is Leah Whitaker, and I too am a long-term resident of the community. I live on Del Valle Road. So, my question to you is, has there been a traffic study done on Del Valle Road? The traffic right now has become horrendous. There's usually, on an average weekly basis, an accident or pretty close to an accident on either Silver Street, Cromwell, or Hunstock. It's impossible sometimes for people to get out and turn left or turn right. I do see that you mentioned a realignment of Dell Valle Road. I don't know what that constitutes, but I think a more sincere study could be done and there needs to be an alternate route to access the community because right now very few people go out Highway 126, because it's a death trap trying to make that left. I know there's been a study to put a signal light in, but the study has been going on for years. Can I get a little clarification on that please? 1-9

Gina Natoli: Thank you Miss Whitaker. Yes, Mr. Williams, who on your team, if not you, would be able to address the traffic improvements, in a summarized manner?

Hunt Williams: So, I thought I'd have Darryl, Darryl Zerfass can you hear me? Okay.

So, I thought, can you hear me, Gina?

Gina Natoli: Yes, Mr. Williams.

Hunt Williams: So, I was hoping to have Darryl Zerfass our traffic engineer. I think I can speak to this. So, we have an extensive, in the EIR, is an approved traffic study, and I encourage anybody and everybody to review that. It's a big component of the project. We have an approved traffic study. Right now, Del Valle Road is a very substandard, dangerous road, as mentioned. There is lots of wrecks. We will be completely reengineering, and redesigning, rebuilding that road to bring it up to current County standards for limited secondary highway, and a portion of that road will be realigned down around the new proposed park. We will keep the existing Del Valle Road open where the residents currently live, but the traffic along the old Del Valle Road down near the curve of Del Valle and

Hunstock will see a significant decrease of traffic because most of the traffic will be realigned around the west side of the park, heading down Chiquita Canyon. So, we encourage you look at the traffic study. We spent a lot of time and effort on this, and I think we will be mitigating all the impacts due to traffic with our Project and approved traffic study, which deals with safety issues.

Gina Natoli: Just if you could refresh my memory Mr. Williams, is there a signal being proposed for, is it Del Valle and 126?

Hunt Williams: Yes, and that is undergoing right now with LA County and Caltrans, they are in the process of, I believe, of designing that signal and we are contributing our fair share to those improvements.

Gina Natoli: Very well. Thank you, Mr. Williams. Mr. Zerfass if you are available do you have anything to add?

Darryl Zerfass: Yes. I am here.

Gina Natoli: First if I could ask Ms. Soo to swear you in.

Kimberly: Yes. Do you swear or affirm under penalty of perjury that the testimony you may give in the matter pending before this Hearing Examiner shall be the truth, the whole truth, and nothing but the truth?

Darryl Zerfass: Yes.

Kimberly: Thank you. Please state your name for the record and you may continue.

Darryl Zerfass: Darryl Zerfass. I am a Principal Transportation Engineer with Stantec, and as Mr. Williams noted we prepared a traffic study for this Project. It is included with the EIR. So, it is available for the public to review, and I would just concur that what Mr. Williams stated about the realignment of Del Valle Road and the traffic signal that is planned for Chaquito Canyon Road and SR-126 is accurate.

Gina Natoli: Alright, very well. Thank you, Mr. Zerfass. Miss Soo, could we have our next speaker please.

Kimberly: Yes. This is our last speaker. Mo Chaudhary. Do you swear or affirm under penalty of perjury that the testimony you may give in the matter pending before this Hearing Examiner shall be the truth, the whole truth, and nothing but the truth?

Please unmute from your end.

Gina Natoli: Mr. Chaudhary, we still need you to unmute yourself. We can't hear you yet.

Mo Chaudhary: Hello.

Gina Natoli: Perfect.

Mo Chaudhary: Yes. Hi. My name is Mo Chaudhary. I own a property in Val Verde.

Gina Natoli: First I need you to answer Ms. Soo's question about promising to tell the truth.

Mo Chaudhary: Yes.

Gina Natoli: Thank you. Thank you very much. Please, please proceed. Thank you.

Mo Chaudhary: Okay. I'm all for new development, and, but in this case, I have a few concerns, and unless they're addressed, you know, I cannot support this project. Number one, sewer is a main, you know, is a big concern for the community of Val Verde. And I know there's been a sewer study that has been done, but I want to know that if the line that Mr. Williams would put in, for this Project, would be sufficient to service the rest of Val Verde, if, you know, Val Verde decides to install something on their own or LA County decides to step in. And, so, I just want to make sure the way it's installed, you know, there would be an option to connect to the rest of Val Verde, and it would have enough size to service that area. So that is a major, major, concern, and, you know, this Project I understand he's been working on it for the past 20 years, but it's a megaproject now. These are all million-dollar homes. So, so, its big money involved now, and Val Verde is a very small community, small houses, and so, I think, you know, the developer should do more to help the community, and be a good neighbor, and you know I would propose extending the sewer line to the rest of Val Verde. I don't think it would be a deal breaker on his part, and if he does that, he would have my support, but unless, you know, I hear otherwise, I'm against this project. Thank you very much. 1-10

Gina Natoli: Thank you Mr. Chaudhary. I'm just going to suggest, Mr. Sackett, that perhaps in the responses to comments, that goes to the Planning Commission, you can mention that several individuals were concerned and raised concerns about the sewer system, were interested in it, were wondering whether it would be able to serve the entire Val Verde community, and that might be important to the Planning Commission to know anyways. Perhaps that's something to add to responses to comments. I'm not sure that that's something that can be answered and addressed right now.

Jodie Sackett: Yes, agreed. That is, seems to be a concern that's coming up. We'll take care of that in response to comments, or we will provide that concern in write-up in staff's report to the Commission.

Gina Natoli: Alright, very well. Ms. Soo, has anyone else signed up to speak?

Kimberly: Yes. We have one additional person. We have Rosana Paladin. I'll swear them in. Do you swear or affirm under penalty of perjury that the testimony you may give in the matter pending before this Hearing Examiner shall be the truth, the whole truth, and nothing but the truth?

Rosana Paladin: Yes, I do.

Kimberly: Thank you. Please state your name for the record and you have three minutes.

Rosana Paladin: Thank you. My name is Rosana Paladin. I'm a homeowner for about ten years. I'm also a real estate broker. I would like to know impact on housing market and on prices. It is kind of significant to know how it will impact the local market, this new development.

1-11

Gina Natoli: Thank you, Ms. Paladin. I'm not sure that that's something, I don't think that's something that's addressed in the Draft EIR. So, I don't think that's actually a question that we could address through the studies that have been done for the environmental impacts for the project. That may be a question that would be better raised at the Regional Planning Commission, and Mr. Sackett, also perhaps this is an issue that you could put into the responses to comments that goes to the Planning Commission and try and address it in that arena.

Rosana Paladin: All right. Thank you.

Gina Natoli: Thank you. I apologize for that. But not every issue can be addressed in the Draft EIR, in the EIR, so hopefully that's an issue that can be further addressed in the Planning Commission.

Rosana Paladin: Understood. Thank you.

Gina Natoli: Thank you, Ms. Paladin. Ms. Soo, anybody else?

Kimberly: There are no additional speakers.

Gina Natoli: Very well. Before we move on, I would give Mr. Williams a couple of minutes if you have any closing comments before I turn back to you, Mr. Sackett.

Hunt Williams: Can you hear me?

Gina Natoli: Yes.

Hunt Williams: Well, I'd just like to thank you and especially Josh and Jodi for their help to get to this point. I'm very proud of our family's legacy out there, and our efforts to create what I think is a really, a balanced Project. I think we've covered all our bases. Encourage anybody to review the EIR. I think we've addressed everything, and we look forward to getting to the Planning Commission. Getting the Project approved so we can provide some much-needed new housing to this area and thank you very much for your time.

Gina Natoli: Thank you, Mr. Williams. Mr. Sackett, do you have anything else to add?

Jodie Sackett: Yes. Just one thing. Just to again reiterate that the Project is not proposing any legislative entitlements. The final approval will be at the Regional Planning Commission level unless the Project is appealed to the Board of Supervisors. And that's all that I have. Thank you.

Gina Natoli: Very well. Then I'd like to, first, before I go through my closing spiel, the comment period right now according to the notice runs through the 9th of January 2022. That is a Sunday. Would there be any concerns leaving the comment period open through Monday the 10th?

Jodie Sackett: For staff I don't think that would be a concern of ours.

Gina Natoli: Alright. Mr. Williams, I can't imagine that one more day on a Monday would cause concern to you is that correct?

Hunt Williams: That's correct.

Gina Natoli: Alright. With that then, I would like to make it known that the comment period should remain open to the 10th, through the 10th of January, which is a Monday. That gives people about 27 days to go through the rest of the Draft EIR and submit any comments to that. Tonight, testimony has been taken on the Draft EIR, and responses to comments will be drafted based on the comments and questions made tonight. Those responses to comments will be given to the Regional Planning Commission for their review at the public hearing, and that hearing will be scheduled at a later date.

So, that hearing at the Regional Planning Commission is actually a public hearing. This is merely a public meeting to take comments. A public hearing will be duly noticed. Everyone within the vicinity of the Project, or who is on the mailing list that is interested in the Project, will receive a notice when that hearing will be. If you're not sure whether you are on the list to receive a notice of the Regional Planning Commission hearing, e-mail Mr. Jodi Sackett, and let him know that you would like to be on that distribution list, and you will receive a notice for that.

So, with that I'd like to thank everyone who spoke. It's always very encouraging to me when individuals in the community are interested in what goes on in their community and take the time and effort to go through documents and to ask questions of developers. We don't know everything, and so, listening to members of the community is always an important part of the review process for the projects, particularly large projects like this. So, I would like to again thank everyone who joined us for this Hearing Examiner meeting tonight for Item 2, and with that Item 2 is concluded. I am moving on to Part 3, the public comment period. Ms. Soo, has anyone signed up or Mr. Huntington has anyone signed up for public comment?

Kimberly: There are no speakers signed up for public comment.

Gina Natoli: Very well then let me thank everyone who, again, attended the meeting. I know there was a very large contingent from Sterling Gateway. Ms. Truman, nice to see your name again, it's been a long time. We do appreciate you being here in case there were any questions. I particularly want to than Ms. Soo tonight. I think you did an excellent job with calling out speakers and swearing them in, and Mr. Sackett, again, thank you for a very good job on the presentation. I appreciate the succinct way that you presented the items. Again, thanks to everyone who helps put on these meeting, particularly the night meetings. They are very long days for us and there is a lot of work that goes on behind the scenes, and then people like, Ms. Luna, who still have work to do after the meeting. You all have work to do after the meeting, particularly someone like Alita, who has minutes and things to compile.

So, with that I want to thank everyone again for being here tonight. The Hearing Examiner meeting is adjourned, and I hope everyone has a very nice evening. Thank you very much.

SPEAKER 1 - TERRY HARA

Comment 1-1:

So, thank you Hunt for your presentation, it was great to see everything. I am a resident of Val Verde, and I'm not opposed to this project. I just have a few clarification questions. One is the commercial property that you are incorporating into your development, is that maintained by the HOA? Will that be owned by somebody separately? Will it be for sale? Things of that nature. Is it independently owned, is my question? And my second question is about the water tower. Mr. Huntington mentioned, I forget who it was, but they said it was going to be west. Is that up San Martinez? If it is, how far up? That starts to affect me because I'm at the top. I'm just wondering where that giant water tank will be sitting. Gosh, what else was there? I think that's it. Thank you.

Response 1-1:

The comment regarding ownership of the commercial use does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no further response is necessary. However, as noted in the transcript, the Applicant responded to this comment.

Regarding the Off-Site Water Tank Area, as indicated in Figure 3.0-2: Vicinity of Project Site, of the Draft EIR, the 2.8-acre Off-Site Water Tank Area would be west of the VTTM site at the end of San Martinez Road. As shown in Figure 3.0-10: Off-Site Water Tank Area, the off-site water tank would be located on disturbed land at an elevation of 1,575 feet above mean sea level, approximately 1.75 miles west of the VTTM site in the vicinity of the existing Cuyama water tank site owned and operated by District No. 36. The proposed tank site would be approximately 2.8 acres in size within the existing Cuyama water tank site. A one-million-gallon water tank would be constructed as part of the Project to provide additional fire suppression capability for the Project and the surrounding community. The new water tank in the Off-Site Water Tank Area would be screened in accordance with the Castaic CSD.

The site is located within a canyon and surrounded by ridgelines to the south, west, and north. Views of the Off-Site Water Tank Area are largely obstructed from public areas. Construction activities would result in earthwork activities and the disturbance area would be limited and obstructed from view by the surrounding ridgelines. As discussed in the Draft EIR, the construction activity associated with the Off-Site Water Tank Area would not have a substantial adverse effect on a scenic vista and impacts would be less than significant.

As discussed in the Draft EIR, the construction of the Off-Site Water Tank Area would occur over approximately four months. Grading of the Off-Site Water Tank Area would consist of approximately 132,000 cubic yards of cut and approximately 1,600 cubic yards of fill. Access to the Off-Site Water Tank

Area for construction trucks and construction workers would be provided from SR-126 to Chiquito Canyon Road to San Martinez Road, or from the I-5 Freeway to Hasley Canyon Road to Del Valle Road to San Martinez Road. Construction personnel would park at the Project site. Each phase of Project construction would result in varying levels of intensity and number of construction personnel. Construction would occur Monday through Friday between 7:00 AM and 3:00 PM.

Upon completion of construction of the water tank within the existing Cuyama water tank site, the water tank would be painted a neutral color to blend in with the adjacent water tanks. The area surrounding the water tank would be revegetated with native plants. As a result, the placement of a new water tank within the existing Cuyama water tank site would not adversely alter the view of a scenic vista. Impacts would be less than significant.

Comment 1-2:

So, you'll be doing the leasing to the business that come?

Response 1-2:

This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no further response is necessary. However, as noted in the transcript, the Applicant responded to this comment.

SPEAKER 2 - SARA OLAGUEZ

Comment 1-3:

My name is Sara Olaguez, and I, in general, I oppose this Project because I worry that it will take away from the integrity of the history of Val Verde in general. So, the actual town of Val Verde has a pretty amazing history that I worry will get lost with this development and all of these big new houses coming in. That's all I have to say.

Response 1-3:

The history of Val Verde is addressed in Section 5.4: Cultural Resources of the Draft EIR, which evaluates the Project's potential impacts on cultural resources. This section includes analysis based on the Cultural Resources Inventory for the Sterling Ranch Estates Project prepared by Dudek in 2018, for the Project site, (see Appendix D.1: Cultural Resources Inventory for the Sterling Ranch Estates Project in the Community of Val Verde, Los Angeles County, California [2018], of the Draft EIR) and the Phase I Archaeological Survey Report for the Sterling Ranch Estates Off-Site Water Tank Site prepared by Dudek in 2020 for the Off-Site Water Tank Area (see Appendix D.2: Phase I Archaeological Survey Report for the Off-Site Water Tank Site [2020], of the Draft EIR). Section 7.0: Effects Found Not to be Significant, further discusses historical resources.

The Initial Study prepared by the County (see Appendix A.2 of the Draft EIR) determined the Project would not result in impacts related to Threshold 5.4-1, Threshold 5.4-2, and Threshold 5.4-4. The discussion concluded that impacts to historic resources, archaeological resources, and any human remains would result in a less-than-significant impact.

The comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

SPEAKER 3 - SUE HERNANDEZ

Comment 1-4:

Sue Hernandez. I'm wondering about the impact this Project will have on those houses on Silver Street which butt up against it.

Response 1-4:

Impacts to Silver Street are discussed in Section 5.11: Noise, in the Draft EIR. The intersection of Silver Street and Del Valle Road is identified as Site 1 for noise analysis. As shown in Table 5.11-3: Existing Ambient Noise Measurements, ambient noise levels ranged from a low of 48.1 dBA west of the VTTM site along Lexington Drive (Site 4) to a high of 67.6 dBA south of the VTTM site at the Del Valle Road and Silver Street intersection (Site 1).

The forecasted noise levels at the nearest residential uses to the Project site from construction activity are shown in Table 5.11-10: Construction Maximum Noise Estimates. As shown, construction noise levels during grading activities would range from 65.9 to 92.0 dBA, resulting in a maximum increase of 5.9 dBA to 32.0 dBA at the residential uses to the south along Silver Street (Site 1). Project-related construction activities during grading would exceed the County's maximum mobile construction noise threshold of 75 dBA at sensitive receptors along Silver Street (Site 1). Implementation of **MM 5.11-1** would reduce potential construction-related noise impacts to less than significant levels.

MM 5.11-1 Prior to the issuance of grading permits, the Project Applicant or their designee shall develop a Construction Noise Reduction Plan to minimize construction noise at nearby noise sensitive receptors. The Construction Noise Reduction Plan shall be developed in coordination with a certified acoustical consultant and the Project construction contractors, and shall be approved by the County of Los Angeles Department of Public Works. The Construction Noise Reduction Plan shall outline and identify noise complaint measures, best management construction practices, and equipment noise reduction measures. The Construction Noise Reduction Plan shall include, but not be limited to, the following actions:

- Construction equipment shall be properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (i.e., mufflers, silencers, wraps, etc.).
- Noise construction activities whose specific location on the Project site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck

idling) shall be conducted as far as feasibly possible from the nearest noise sensitive land uses.

- If feasible, grading activities shall be scheduled so as to avoid operating numerous pieces of heavy-duty off-road construction equipment (e.g., backhoes, dozers, excavators, loaders, rollers, etc.) simultaneously in close proximity to the boundary of properties of off-site noise sensitive receptors surrounding the Project site to reduce construction noise levels by approximately 5 to 10 dB.

- Shroud or shield all impact tools, and muffle or shield all intake and exhaust port on power equipment to reduce construction noise by 10 dB or more.

- Where feasible, temporary barriers, including but not limited to, sound blankets on existing fences and walls, or freestanding portable sound walls, shall be placed as close to the noise source or as close to the receptor as possible and break the line of sight between the source and receptor where modeled levels exceed applicable standards. Noise barriers may include, but not be limited to, using appropriately thick wooden panel walls (at least 0.5-inches think). Such barriers shall reduce construction noise by 5 to 10 dB at nearby noise-sensitive receptor locations. Alternatively, field erected noise curtain assemblies could be installed around specific equipment sites or zones of anticipated mobile or stationary activity. The barrier material shall be solid and dense enough to demonstrate acoustical transmission loss that is at least 10 dB or greater than the estimated noise reduction effect. These suggested barrier types do not represent the only ways to achieve the indicated noise reduction in dB; they represent examples of how such noise attenuation might be attained by this measure.

- Implement noise complaint reporting. A sign, legible at a distance of 50 feet, shall be posted at the Project construction site, providing a contact name and a telephone number through which residents can inquire about the construction process and register complaints. This sign shall indicate the dates and duration of construction activities. In conjunction with this required posting, a noise disturbance coordinator shall be identified to address construction noise concerns received. The contact name and the telephone number for the noise disturbance coordinator shall be posted on the sign. The coordinator shall be responsible for responding to any local complaints about construction noise and shall notify the County to determine the cause and implement reasonable measures to the complaint, as deemed acceptable by the County.

Further discussion of houses on Silver Street is discussed in *Response 1-5*, below.

Comment 1-5:

Well, I live on Silver Street. I wanted to know, will you be able to see the houses from Silver Street? How far up to the top of the hill will it go? Will there be sewer lines available for the people on Silver Street, also? And that's it.

Response 1-5:

As discussed in Section 5.1: Aesthetics in the Draft EIR, the Project is located within the Castaic Area CSD. The purpose of the Castaic Area CSD is to ensure new development will be compatible with the existing character of the Castaic area. The Castaic Area CSD provides guidelines for developers, County officials, and citizens by establishing Castaic's official boundary in relation to its surrounding communities, identifying and requiring certain design requirements, including preservation of significant ridgelines and trail development, and minimum lot sizes for new development. The Castaic CSD is further divided into subareas for more specific development standards. The Project site is located within Area 4, the Val Verde Area, of the Castaic Area CSD. Regulations in the Castaic CSD relevant to aesthetics include hillside management, significant ridgeline protection, protection of native vegetation, limitations on outdoor lighting, and screening of water tanks.

Publicly available short-range views of the VTTM site and Off-Site Roadway Improvement Area are available from segments of nearby roadways, including Del Valle Road and Hunstock Street, with intermittent obstruction due to intervening topography and vegetation. Nonetheless, views of and across the VTTM site and Off-Site Roadway Improvement Area would be expected to change with the implementation of the Project.

As depicted in Figure 5.1-9: Viewpoint 3 of the Draft EIR, Background views of the ridgelines associated with the local hillsides to the west would remain. As the primary view would consist of blue skies, distant ridgelines, single-family homes, and landscaping, the implementation of the Project would not substantially alter the view such that a scenic vista would be adversely affected from Viewpoint 3. Impacts from this viewpoint would be less than significant.

As depicted in Figure 5.1-10: Viewpoint 4 of the Draft EIR, the foreground would show landscaping continuing down the existing hillside toward the rear yard of single-family homes in the canyon below. As the primary view would consist of blue skies, distant ridgelines, single-family homes, and landscaping, the implementation of the Project would not substantially alter the view such that a scenic vista would be adversely affected from Viewpoint 4. Impacts from this viewpoint would be less than significant.

The ridgeline that separates Silver Street from the VTTM Site would remain. Impacts from this viewpoint would be less than significant.

Sewer service is analyzed in Section 5.17.2: Utilities and Service Systems, Wastewater, of the Draft EIR. The Sewer Line Improvement Area includes a proposed 4-inch ductile iron pipe sewer force main that would be constructed from the easterly VTTM site boundary within Del Valle Road approximately 3,425 feet to the point of connection with the existing 15-inch sewer line in Hasley Canyon Road to the north. As part of the 0.8-acre Sewer Line Improvement Area, approximately 0.8 acres of existing roadway right-of-way would be disturbed within Del Valle Road during construction of the sewer mainline. Development of these uses would occur in conjunction with the construction of the Project and in accordance with Los Angeles County Department of Public Works (LACDPW) guidelines. The Project's sewer flows when combined with other anticipated downstream sewer flows would be 85.4 percent of designed pipeline capacity for sewer mainlines greater than 15-inches. Based on the analysis presented in the Sewer Study, no replacement of downstream sewers would be required with implementation of the Project. The Project would increase daily treatment by approximately 0.06 million gallons per day (MGD) to 18.46 MGD, or approximately 0.6 percent of the remaining 9.7 MGD daily treatment capacity. As such, adequate treatment capacity would be available during Project operation. The current combined capacity of the Santa Clarita Valley Sanitation District (SCVSD) system is 28.1 MGD (31,470 AFY). An adequate treatment capacity would be available during Project operation. Impacts associated with wastewater conveyance and wastewater treatment systems would be less than significant.

The Project has no requirements to provide sewer lines to existing homes in the community. If an individual homeowner wanted to connect their existing home to the new sewer lines, they would be obligated to construct a mainline and lateral to their home at their cost.

SPEAKER 4 -RICK SAWYER

Comment 1-6:

Okay. My name is Rick Sawyer and I'm a property owner in the Val Verde area. I just wanted to let you know that I've read the Draft EIR, and I think that it pretty much covers almost everything that I would think you could come up with as far as the property is concerned. I appreciate that the County has done a thorough review of the reports and studies for the Project. I think, you know, this has been a long time coming and I think the Project fits, shoehorns, right into that space perfectly. I think that the surrounding homes will probably be, the value, will probably be going up because the newer homes, of course people coming in and everything. So infused energy into the Project. I look forward to the new park that will be created. I think that will be great open space for people to go and get down there play a little soccer and have families come down to an area that right now in Val Verde there's not a lot of areas other than up by the swimming pool, whatnot. So, this is a new area that will be created for people to kind of have a chance to get out there, and the open space and conservation easement is pretty cool. You know, with hiking trails that go throughout. You know there's a lot going on with this Project that's going to help the area, especially the water. It has, I think it has, plenty of water. Million-gallon tank for fire suppression, and all that. So, I support the Planning Commission approval as you get to that point. And thank you for all your efforts. And that's about all I have to say at the moment.

Response 1-6:

This comment expresses general support for the Project and cites some of the Project's features. The comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As this comment does not address the information, analysis, or conclusions in the Draft EIR and, no further response is necessary.

SPEAKER 5 - TIMOTHY WILLIAMS

Comment 1-7:

I'm a long-time resident of Val Verde since 1959. And this project just like Sara Oleguez said would be a disaster for the integrity of the history of Val Verde. Because we've been, have a rich history and these homes would be like a definitely overdevelopment and massive traffic. Sewer system as you said it's only going up to Hunstock and Del Valle, but not for the rest of the community. So, we've been kind of, plus I sit on the Board, and we've been against this project for some time now. And I don't see the benefits for our community whatsoever. Mr. Hunt came up to the park for a meeting a few years ago and I asked a question about the sewer system, which I never got an answer for. And I live on Del Valle at this present time. Just looking out the door just looking out the community is fine, but this project just would disrupt our history and our landscape. That's about it.

Response 1-7:

Pease refer to *Response 1-3* regarding impacts to cultural and historical resources.

The Project is consistent with the land use designations, zoning, and community standards district for the Project site.

As discussed in Section 5.10: Land Use and Planning of the Draft EIR, the VTTM site and the Off-Site Roadway Improvement Area have an "urban" designation of H2–Residential 2 and H5–Residential 5 under the 2012 Santa Clarita Valley Area Plan (SCVAP 2012), which is a component of the County's General Plan, allowing single-family residential uses with a maximum of two dwelling units per acre or five dwelling units per acre, respectively. The commercial component of the VTTM site, designated CG–General Commercial, provides for commercial uses serving the local community such as restaurants and retail. The Off-Site Sewer Line Improvement Area, the Off-Site Open Space Dedication Area, and the Off-Site Water Tank Area are designated as R5–Rural Land 5, R2, and R20, respectively, which allow for low-density residential uses on large lots, equestrian and limited animal, and agricultural uses. The Off-Site Water Line Improvement area is designated as H2.

The Los Angeles County Zoning Ordinance (Title 22 of the Los Angeles County Code) regulates development through land use designations and development standards. The VTTM site is zoned as R-1–Single Family Residence and C-2–Neighborhood Commercial. The Off-Site Roadway Improvement Area is zoned R-1. The Off-Site Open Space Dedication Area is zoned as A-2-2 and A-2-5, Light and Heavy Agricultural uses, respectively. The Off-Site Water Line Improvement Area and the Off-Site Sewer Line Improvement Area are located within the roadway right-of-way and surrounded by R-1, A-2-2, and

Residential Planned Development (RPD)-5000-2.8U. The Off-Site Water Tank Area is zoned A-2-2. The Project is consistent with current zoning.

The Project site is located within Area 4, the Val Verde Area, of the Castaic Area CSD. The Southern California Association of Governments (SCAG), the agency which is the federally recognized Metropolitan Planning Organization (MPO) for the Southern California region, identifies the existing General Plan land use designations as "Single Family Residential" and "Commercial and Services."

The Castaic Area Castaic Area CSD was approved by the Los Angeles County Board of Supervisors in December of 2004 and is part of the County Planning and Zoning Code applicable to the Project, codified as Los Angeles County Code Section 22.44.137. The Castaic Area CSD defines the Castaic area of influence within Los Angeles County and describes the development standards that manage the growth of the Castaic community. The purpose of the Castaic Area CSD is to ensure new development will be compatible with the Castaic area's existing character, identifying, and requiring certain design requirements, including preservation of significant ridgelines and trail development, minimum lot sizes greater than 7,000 sq. ft. for new development, and average lot sizes of at least 10,000 sq. ft. for a new subdivision. The goals and policies of the Castaic Area CSD that are applicable to the Project and an analysis of the Project's consistency with these goals and policies are provided in Table 5.10-3: Castaic Area Community Standards District Project Consistency Analysis of the Draft EIR.

The Project would provide 222 residential lots, which is fewer than the 253 maximum residential lots permitted under the Santa Clarita Valley Area Plan: One Valley One Vision (SCAVAP) 2012; approximately 41 percent of the lots greater than 7,000 sq. ft. would have an average lot size of 11,634 sq. ft., consistent with the Castaic Area CSD standards for lot sizes. The Project would provide the minimum lot setbacks under Los Angeles County Zoning Ordinance and would maintain heights for both residential and commercial structures below 35 feet above grade. The Project would provide two private recreation lots available to the public consistent with the Castaic Area CSD and would provide supporting off-site improvements consistent with County Code. The Project is consistent with the development standards, goals, objectives, and policies of the Los Angeles County General Plan, SCVAP 2012, Los Angeles County Code, and Castaic Area CSD.

As discussed in Section 5.12: Population and Housing of the Draft EIR, the Project would include the development of 222 single-family homes consistent with existing land use and zoning designations. The Project would result in an increase of 686 persons and nine employment opportunities to the greater Santa Clarita Valley area. The population, housing, and employment growth assumptions were considered in the regional projections. The Project would represent approximately 1.6, 5.5, and 0.08 percent of SCAG 2040 projections for population, housing, and employment, respectively. Such levels of growth are

consistent with the population forecasts for the subregion as adopted by SCAG. The Project is also consistent with the types, intensity, and patterns of land use envisioned for this region.

The Project as described and analyzed in the Draft EIR is the proposed subdivision of the site to create 222 single-family lots consistent with existing land use and zoning designations. No homes have been designed at this time and no information is available regarding the likely prices of homes that would be developed on proposed residential lots. Further, the prices of the homes that could be developed on proposed residential lots is an economic, and not an environmental, matter. Per CEQA Guidelines Section 15131(A), the economic or social effects of a project will not be treated as significant effects on the environment.

A traffic study for the Project was completed and included in the Draft EIR as Appendix M. As discussed in Section 5.15: Traffic and Transportation of the Draft EIR, Project roadway design would be consistent with the Castaic Area CSD and would reduce motor vehicle speeds with traffic-calming features such as pedestrian crossing signage, crosswalks at commercial and park areas, and feedback signs indicating speed of vehicles along Del Valle Road throughout the VTTM site and Off-Site Roadway Improvement Area, as recommended in MM 5.15-3. Road improvements would also further reduce the vehicle miles traveled (VMT) associated with the residential vehicle trips through the inclusion of mitigation measures including, but not limited to, the provision to provide community wireless internet connection to encourage tele-commuting; crosswalks at appropriate locations for on-site streets and intersections near commercial and park areas; and amenities for neighborhood electric vehicles (NEVs). The Draft EIR identifies the following mitigation measure requiring the incorporation of traffic-calming measures into the final design of the Project, consistent with the recommendation in this comment.

Please refer to *Response 1-5* regarding sewers. An adequate treatment capacity would be available during Project operation. Impacts associated with wastewater conveyance and wastewater treatment systems would be less than significant.

Please refer to *Response 1-5* regarding aesthetics. The Project is located within the Castaic Area CSD. The purpose of the Castaic Area CSD is to ensure new development will be compatible with the Castaic area's existing character. The Castaic Area CSD provides guidelines for developers, County officials, and citizens by establishing Castaic's official boundary in relation to its surrounding communities, identifying and requiring certain design requirements, including preservation of significant ridgelines and trail development, and minimum lot sizes for new development.

SPEAKER 6 - ARTHUR LOPEZ

Comment 1-8:

I've been a resident since 1989 here in Val Verde, and I enjoy it very much and I appreciate all the work that this Planning Commission is putting together. I notice there's going to be Internet access provided, wireless. Can there also be cell phone access provided? Because right now if you're on Del Valle Road in your car, it ceases to function. There's no way to call for AAA or anything around this area via cell phone. So, I just wanted that to be added a as a consideration for safety. That's all.

Response 1-8:

As indicated in **MM 5.15-2** in Section 5.15: Transportation of the Draft EIR , the Project would provide Wi-Fi connectivity at community areas to facilitate tele-commuting.

MM 5.15-2: Prior to final map recordation, the Project Developer shall provide to the LACDPW the location and function of a community wireless internet (Wi-Fi) connection for review and approval, such as at the commercial retail and park sites, to promote tele-commuting (tele-work). Additionally, the Project Applicant shall provide a Covenant and Agreement to LACDPW for maintaining the community Wi-Fi connection prior to final map recordation. Purchasers of homes shall be informed of the location and relevant information to access the community Wi-Fi connection prior to the close of escrow.

Prior to the issuance of an occupancy permit for the 116th residential unit, the 3.4-acre neighborhood park shall be rough graded and constructed. The community Wi-Fi shall be installed at the 3.4-acre neighborhood park upon completion of construction.

Prior to the issuance of an occupancy permit for the 194th residential unit, the commercial retail center shall be graded. The community Wi-Fi shall be installed at the commercial retail center upon completion of construction.

As discussed in Section 5.17.4: Dry Utilities of the Draft EIR, dry utilities and service systems are made available by a range of private companies, private enterprises acting as public utilities, and public agencies in the County. Major service systems providers in the Project area include AT&T, Frontier Communications, Spectrum, and Verizon, which provide telecommunication and internet services. As development continues in this area, the telecommunication companies would provide additional system capacity and service connections. Telecommunications infrastructure is typically expanded in response to increasing demand and system expansion and improvements occur as needed. It is expected that providers would continue to expand infrastructure capacity if necessary to meet demand increases within their service

area. The Project would be served by the existing AT&T or Verizon telecommunications infrastructure surrounding the VTTM site, and also would be anticipated to incorporate site-specific infrastructure improvements, as appropriate. The Project would result in less-than-significant impacts to the telecommunications infrastructure in the surrounding area.

SPEAKER 7 - LEAH WHITAKER

Comment 1-9:

My name is Leah Whitaker, and I too am a long-term resident of the community. I live on Del Valle Road. So, my question to you is, has there been a traffic study done on Del Valle Road? The traffic right now has become horrendous. There's usually, on an average weekly basis, an accident or pretty close to an accident on either Silver Street, Cromwell, or Hunstock. It's impossible sometimes for people to get out and turn left or turn right. I do see that you mentioned a realignment of Dell Valle Road. I don't know what that constitutes, but I think a more sincere study could be done and there needs to be an alternate route to access the community because right now very few people go out Highway 126, because it's a death trap trying to make that left. I know there's been a study to put a signal light in, but the study has been going on for years. Can I get a little clarification on that please?

Response 1-9:

A traffic study for the Project was completed, approved by LACDPW, and included in the Draft EIR as Appendix M. As discussed in Section 5.15: Traffic and Transportation of the Draft EIR, Del Valle Road would require roadway improvements to ensure user safety. The road would be widened to 64 feet within approximately 80 feet of public right-of-way, increasing roadway safety for all users. This would allow Del Valle Road to meet current County standards for a Limited Secondary Highway. The Project's improvements to Del Valle Road would include the implementation of the planned Class III Bike Route as identified in the County's 2012 Bicycle Master Plan. The Project would continue to facilitate transit access to and through the Project site. Existing buses would benefit from the new roadway alignment along Del Valle Road, which is more direct and would reduce transit travel time. Additionally, the Project would include recommended mitigation to relocate a nearby existing bus stop on Del Valle Road to the proposed Sterling Ranch Parkway at a location in direct proximity to the proposed commercial retail and park uses.

The extension of Chiquito Canyon Road as Sterling Parkway also would provide access to the Project site and would include four new intersections with local roadways constructed within the Project site. The proposed Sterling Parkway would provide one lane in each direction and would extend north from Hunstock Avenue to Del Valle Road as a designated limited secondary highway within 80 feet of public right-of-way. The proposed Sterling Parkway would route traffic between Del Valle Road and Chiquito Canyon Road away from Silver Street, Cromwell Avenue, and Hunstock Street. Access to Silver Street, Cromwell Avenue, and Hunstock Street from Del Valle Road would remain.

The Project roadway design would be consistent with the Castaic Area CSD and would reduce motor vehicle speeds with traffic-calming features such as pedestrian crossing signage, crosswalks at commercial and park areas, and feedback signs indicating speed of vehicles along Del Valle Road throughout the VTTM

site and Off-Site Roadway Improvement Area, as recommended in **MM 5.15-3**. Road improvements would also further reduce the VMT associated with the residential vehicle trips through the inclusion of mitigation measures, including, but not limited to, the provision to provide community wireless internet connection to encourage tele-commuting, crosswalks at appropriate locations for on-site streets and intersections such as near commercial and park areas, and amenities for NEVs. The Draft EIR identifies the following mitigation measure requiring the incorporation of traffic-calming measures into the final design of the Project, consistent with the recommendation in this comment.

MM 5.15-3: Prior to the issuance of building permits and final Project design, the Project Developer shall incorporate the location of traffic calming measures, such as marked crosswalks at appropriate locations, for on-site streets and intersections. Specific measures shall comply with the Castaic Area Community Standards District (CSD) and shall be approved by LACDPW.

SPEAKER 8 - MO CHAUDHARY

Comment 1-10:

Okay. I'm all for new development, and, but in this case, I have a few concerns, and unless they're addressed, you know, I cannot support this project. Number one, sewer is a main, you know, is a big concern for the community of Val Verde. And I know there's been a sewer study that has been done, but I want to know that if the line that Mr. Williams would put in, for this Project, would be sufficient to service the rest of Val Verde, if, you know, Val Verde decides to install something on their own or LA County decides to step in. And, so, I just want to make sure the way it's installed, you know, there would be an option to connect to the rest of Val Verde, and it would have enough size to service that area. So that is a major, major, concern, and, you know, this Project I understand he's been working on it for the past 20 years, but it's a megaproject now. These are all million-dollar homes. So, so, its big money involved now, and Val Verde is a very small community, small houses, and so, I think, you know, the developer should do more to help the community, and be a good neighbor, and you know I would propose extending the sewer line to the rest of Val Verde. I don't think it would be a deal breaker on his part, and if he does that, he would have my support, but unless, you know, I hear otherwise, I'm against this project. Thank you very much.

Response 1-10:

Please refer to *Response 1-5* regarding sewers. Section 5.17.2 Utilities and Service Systems: Wastewater of the Draft EIR, analyzes sewer services. An adequate treatment capacity would be available to serve the Project during Project operations. A Sewer Area Study was approved by the Los Angeles County Department of Public Works, Land Development Division on April 2, 2020, and is included as Appendix O.2 of the Draft EIR. Impacts associated with wastewater conveyance and wastewater treatment systems would be less than significant.

SPEAKER 9 - ROSANA PALADIN

Comment 1-11:

Thank you. My name is Rosana Paladin. I'm a homeowner for about ten years. I'm also a real estate broker. I would like to know impact on housing market and on prices. It is kind of significant to know how it will impact the local market, this new development.

Response 1-11:

Per CEQA Guidelines Section 15131(A), the economic or social effects of a project will not be treated as significant effects on the environment. This comment does not address the information, analysis, or conclusions in the Draft EIR and, for this reason, no response is necessary.

5.0 MITIGATION MONITORING AND REPORTING PROGRAM

A. INTRODUCTION

California Public Resources Code section 21081.6 and Section 15097 of the California Environmental Quality Act (CEQA) Guidelines require public agencies to establish monitoring and reporting programs for projects approved by a public agency whenever approval involves the adoption of either a mitigated negative declaration or specified environmental findings related to environmental impact reports.

This is the Mitigation Monitoring and Reporting Program (MMRP) for the Sterling Ranch Estates Residential Project (Project). The intent of the MMRP is to ensure the successful implementation of the mitigation measures identified in the Final Environmental Impact Report (Final EIR) for the Project.

Mitigation Monitoring and Reporting Program

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
5.1 Aesthetics				
PDF 5.1-1: The Project will include features surrounding the infiltration basin south of the private park such as decorative fencing around the site; drought-tolerant grasses on the basin floor and side-slopes; and trees and shrubs along Sterling Parkway and around the basin edge consistent with the County's Drought-Tolerant Landscaping Ordinance.	A. Submit landscape plan for review and approval. B. Implement approved landscape plan.	Prior to the issuance of building permits and approval of the final Project design and landscaping	Applicant/ Construction Manager	• LACDRP
PDF 5.1-2: The pump station proposed between Sterling Parkway and the infiltration basin will be enclosed and would be designed to have Spanish, Southwestern, or Mediterranean architecture with a tile decorated roof.	A. Submit building plan for review and approval. B. Implement approved building plans.	Prior to the issuance of building permits and approval of the final Project design	Applicant	• LACDRP
MM 5.1-1: Where construction is visible from publicly available locations adjacent to the VTTM site and Off-Site Roadway Improvement Area, temporary construction fencing shall be placed along Del Valle Road and the periphery of the VTTM site and Off-Site Roadway Improvement Area to screen construction activity from view at the street level from off-site locations. In addition, the Project Developer shall ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers visible to the public, and that such temporary barriers are maintained in a visually attractive manner throughout the construction period.	A. Temporary construction fencing to screen construction activity. B. Daily visual inspections of temporary barriers.	During Construction	Applicant/ Construction Manager	• LACDRP
MM 5.1-2: Prior to final map recordation, the Project Developer shall incorporate streetscape landscaping along the primary street network including along Sterling Parkway and Del Valle Road. Landscaping shall comply with the County's Drought Tolerant Landscaping	A. Submit landscape plan for review and approval. B. Implement approved landscape plan.	Prior to final map recordation.	Applicant/ Construction Manager	• LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
Ordinance and shall be approved by Los Angeles County Department of Regional Planning.				
MM 5.1-3: Prior to final map recordation, commercial (nonresidential) buildings shall be designed to front Sterling Parkway, with the main pedestrian entrances accessing publicly available pedestrian access located on Sterling Parkway with any off-street parking located in the rear of the buildings(s) and shall be approved by Los Angeles County Department of Regional Planning.	A. Submit building plan for review and approval. B. Implement approved building plans.	Prior to final map recordation.	Applicant/ Construction Manager	• LACDRP
MM 5.1-4: Prior to map recordation, the eight to 17-foot wide paver area along Hunstock Avenue between Del Valle Road and Coolidge Avenue shall include landscaping improvements in the form of a "paseo," and shall be approved by Los Angeles County Department of Regional Planning.	A. Submit landscape plan for review and approval. B. Implement approved landscape plan.	Prior to final map recordation.	Applicant/ Construction Manager	• LACDRP
MM 5.1-5: Prior to map recordation, all single-family homes shall incorporate aesthetically attractive fenestration (door and window treatments) on elevations fronting the streets and shall be approved by Los Angeles County Department of Regional Planning. In instances where fenestration cannot be provided in the sides and rear, decorative split-face walls hall be included into the design.	A. Submit building plan for review and approval. B. Implement approved building plans.	Prior to final map recordation.	Applicant/ Construction Manager	• LACDRP
5.2 Air Quality				
MM 5.2-1: Construction Emissions • During construction, the Project shall use 2010 and newer diesel haul trucks (e.g., material delivery trucks) and, if the County of Los Angeles Department of Regional Planning determines 2010 model year or newer diesel trucks cannot be obtained, the Project shall use trucks that meet EPA 2007 model year NOx emissions requirements.	A. Apply for SCAQMD operating permit. B. Project Developer shall provide incentives to encourage construction contractors to apply for SCAQMD "SOON" funds. C. Maintain log demonstrating	Prior to commencement of construction/ During construction.	Applicant/ Construction Manager	• LACDRP • SCAQMD

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
• During construction, 25 percent of the on-site construction equipment shall meet EPA Tier 4 Final standards and the remaining 75 percent shall meet Tier 3/Tier 4 Interim emission standards for all off-road diesel-powered construction equipment greater than 50 hp. In addition, all construction equipment shall be outfitted with best available control technology (BACT) devices certified by the California Air Resources Board (CARB). • The Project Developer shall provide to the County of Los Angeles Department of Regional Planning a copy of each unit's certified tier specification, BACT documentation, and CARB or South Coast Air Quality Management District (SCAQMD) operating permit at the time of mobilization of each applicable unit of equipment. • The Project Developer shall provide incentives to encourage construction contractors to apply for SCAQMD "SOON" funds, which provides funds to accelerate cleanup of off-road diesel vehicles, such as heavy-duty construction equipment.	compliance.			
MM 5.2-2: The Project Developer shall implement additional dust suppression measures during project construction, in the form of more frequent water dust suppression and other control measures that are beyond the SCAQMD Dust Control Plan requirements. The additional dust suppression measures shall be implemented prior to, during, and immediately following ground-disturbing activities and shall be incorporated into the SCAQMD's Dust Control Plan. These additional measures shall, at a minimum, include, the following: • Increased frequency of watering, above and beyond SCAQMD Dust Control Plan requirements, of on-site	A. Maintain log demonstrating compliance. B. Copy of the SCAQMD approved Dust Control Plan shall be submitted to LACDRP for review and approval. C. Maintain log demonstrating compliance.	During construction.	Applicant/ Construction Manager	• LACDRP • SCAQMD

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
unpaved roads, off-site unpaved roads used for site access, and active construction areas if wind speeds exceed 25 mph or if temperatures exceed 95 degrees Fahrenheit for three consecutive days. The additional dust suppression shall continue until winds are 15 mph or lower and ambient air temperatures are below 90 degrees for at least two consecutive days; • Paved streets adjacent to the Project site shall be swept as needed to remove silt that may have accumulated from construction activities so as to prevent excessive amounts of dust; • All material excavated or graded shall be sufficiently watered to prevent excessive amounts of dust. Watering shall occur at least twice daily with complete coverage, preferably in the late morning and after work is done for the day; • All trucks hauling excavated or graded material on-site shall comply with State Vehicle Code Section 23114 regarding the prevention of such material spilling onto public streets by use of shed boards, truck covers, and other protective measures; and • A copy of the SCAQMD approved Dust Control Plan shall be submitted to the County of Los Angeles Department of Regional Planning prior to the issuance of construction related permits.				
MM 5.2-3: Prior to the issuance of any construction related permits, the Project Developer shall prepare and implement a worker training program that describes the potential health hazards associated with Valley Fever, common symptoms, proper safety procedures to minimize health hazards, and notification procedures if suspected work-related symptoms are identified during	A. Prepare and implement a worker training program. B. Maintain log demonstrating compliance.	Prior to the issuance of any construction related permits.	Applicant/ Construction Manager	• LACDRP • SCAQMD

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
construction. Additionally, this training program shall include worker training on the implementation requirements on the SCAQMD approved Dust Control Plan. Copies of the training program shall be provided to the County of Los Angeles Department of Regional Planning. The worker training program shall identify safety measures to be implemented by construction contractors during construction. These measures shall include the following: • HEPA-filtered, air-conditioned enclosed cabs shall be provided on heavy equipment when available. Workers shall be trained on the proper use of cabs, such as turning on air conditioning prior to using the equipment; • Communication methods, such as two-way radios, shall be provided for use by workers in enclosed cabs; • Personal protective equipment (PPE), such as half-mask and/or full-mask respirators equipped with particulate filtration, shall be provided to workers active in dusty work areas upon request; • Separate, clean eating areas with hand-washing facilities shall be provided for construction workers; and • Equipment, vehicles, and other items shall be cleaned before they are moved off-site to other work locations.				
5.3 Biological Resources				
MM 5.3-1: Conservation Easement. Prior to the issuance of grading permits for the Project, to address impacts to habitat for slender mariposa lily, Peirson's morning glory, and sensitive vegetation communities (Rhus trilobata	A. Project Developer shall record a conservation easement. B. Prepare Conservation	Prior to the issuance of grading permits.	Applicant/ Construction Manager	• CDFW • LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
association [S3, riparian], and Palmer's goldenbush scrub [S3?]), the Project Developer shall record a conservation easement, after review, input, and approval by the County of Los Angeles Department of Regional Planning and the California Department of Fish and Wildlife, over the 37.9-acre Off-Site Open Space Dedication Area. There shall be no grading or other construction activities allowed within the Off-Site Open Space Dedication Area conservation easement boundaries. The conservation easement shall prohibit entry into the preserved area with the installation and maintenance of protective measures such as fencing and signage, and trash removal. Controlled entry shall be allowed for approved work, including monitoring and maintenance efforts, implementation of the Slender Mariposa Lily Mitigation and Monitoring Plan (SMLMMP), or for other activities associated with preserve management. The conservation easement shall prohibit development of any kind within the preserved area in perpetuity. The conservation easement shall also specify allowable uses in the preserved area, if any. Signage shall include information on the organization that holds the conservation easement, descriptions of the restoration activities, protection of biological resources, and restrictions to human access. Signage shall designate if permitted access is allowed within the conservation easement and if so, shall designate that humans and domesticated pets shall remain within designated areas, all domesticated pets shall be on leashes, owners shall clean up after domesticated pets, and that smoking is prohibited. If access is permitted in designated areas, dog waste bag dispensers and wildlife-proof receptacles for trash shall be provided. The conservation easement holder shall be an entity which has as part of its mission	Management Plan (CMP), including Slender Mariposa Lily Mitigation and Monitoring Plan (SMLMMP). C. CDFW and LACDRP approval of SMLMMP. D. Implement CMP and approved SMLMMP. E. Conduct Property Analysis Record (PAR). F. Maintain log demonstrating compliance.			

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
the protection of the environment, including lands, plant species, and/ or wildlife species, and is expected by its organization and history to remain in existence for the foreseeable future. As part of recording the conservation easement, a Conservation Management Plan (CMP) shall be prepared that specifically identifies the required resource management activities and the entities that shall be responsible for managing those activities in perpetuity. The CMP shall include a SMLMMP to be approved by California Department of Fish and Wildlife and the County of Los Angeles. The SMLMMP shall provide guidance and methods to preserve the slender mariposa lily individuals known to occur within the Off-Site Open Space Dedication Area conservation easement, along with a program of slender mariposa lily seed collection and dispersal within the Off-Site Open Space Dedication Area conservation easement. The SMLMMP shall also include methods and approach to translocating slender mariposa lily individuals proposed for impact into the Off-Site Open Space Dedication Area conservation easement. The SMLMMP shall be developed and implemented with a program that does not conflict with other conservation easement resource management objectives. The SMLMMP shall include, at minimum 5:1, mitigation for impacts to 171 slender mariposa lily individuals, as well as preservation of the existing population of slender mariposa lily individuals already documented within the Off-Site Open Space Dedication Area conservation easement. The 5:1 mitigation ratio for planted mariposa lilies shall be effected through overplanting at 10:1 (mitigation plantings: impacted individuals), in order to accommodate potential mortality of slender mariposa lily individuals and the				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
difficulty of censusing populations due to low frequency of flowering. The Slender Mariposa Lily Mitigation and Monitoring Plan **(**SMLMMP) shall include annual pre-construction surveys of the Project impact areas, Open Space Dedication Area conservation easement, and open space areas within the VTTM site to map and flag slender mariposa lily individuals recording the location and quantities of slender mariposa lily for seed collection (Project impact area, Open Space Dedication Area conservation easement, and open space areas within the VTTM site) and translocation (from the Project impact area to the Open Space Dedication Area conservation easement). Seed collection shall occur for a minimum of two years. If Project construction is delayed additional annual surveys and seed collection may occur. Seeds shall be collected once the seed has matured, but prior to the seed capsules opening to disperse the seed. Seeds shall be stored in breathable paper bags in a cool, dry, and dark place until it can be planted within the Off-Site Open Space Dedication Area conservation easement. Upon establishment of the Off-Site Open Space Dedication Area conservation easement, seed shall be sowed within appropriate habitat in the Off-Site Open Space Dedication Area conservation easement. During pre-construction surveys, slender mariposa lily individual locations will be marked with a high-accuracy GPS unit and a permanent marker established in the field to locate the individuals for bulb collection. Bulbs shall remain in the ground until project development. Prior to Project development, the bulbs and adjacent topsoil (including associated microorganisms and mycorrhizal fungi) shall be translocated within appropriate habitat in the Off-Site Open Space Dedication Area conservation				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
easement as directed by the SMLMMP. The SMLMMP shall provide details on site preparation measures, as well as specific methods for the pre-construction collection of slender mariposa lily seeds and the harvest of bulbs from impacted populations. The SMLMMP shall also provide detailed methods for the dispersal of that seed, and the translocation of the harvested bulbs, into the conservation easement areas. Finally, the SMLMMP shall provide a schedule and action plan for the maintenance and monitoring programs, including success criteria, and remedial contingency measures to be implemented if efforts are not successful. During slender mariposa lily monitoring, the Off-Site Open Space Dedication Area conservation easement shall be surveyed for slender mariposa lilies including the translocated bulb and seed locations recorded with a high-accuracy GPS unit and permanent field markers. Slender mariposa lily monitoring data shall include data on both blooming and vegetative slender mariposa lily individuals to track the success of establishment. The CMP and the SMLMMP shall identify the frequency of weed management and monitoring activities to document on-site special-status plant population dynamics, and general vegetation community composition and status. In addition to routine and as needed weed management, the CMP shall include a eradication program specific to the non-native tree of heaven (Ailanthus altissima) individuals, along with a program to replace those nonnative trees with native trees appropriate to the habitat. Monitoring shall take place annually and in perpetuity from the time of establishment of the conservation easement. If it appears that the population of any				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
special-status plant species or the vegetation community composition and status are on the decline or have been degraded, remedial activities, shall be implemented according to the CMP and the SMLMMP. These activities may include weed control, additional seeding, native plant establishment, or other activities where appropriate. If slender mariposa lily seeding and translocation at the Off-Site Open Space Dedication Area conservation easement results in failure of progressing towards a self-sustaining population, understanding that populations vary greatly annually due to environmental conditions, achieving the 5:1 (mitigation plantings: impacted individuals) mitigation ratio for planted mariposa lilies. However, growth and development of SML can vary greatly with seasonal (i.e., winter/spring) environmental conditions. Therefore, the need for remedial action will be assessed in consideration of growth and development of the mitigation population relative to nearby reference populations, and remedial actions will be triggered when the mitigation population is observed to trend negatively in direct comparison to other SML reference populations. To supplement the shortfalls of slender mariposa lily mitigation at the Off-Site Open Space Dedication Area conservation easement, a contingency measure including additional off-site, in-kind preservation of slender mariposa lilies within the County shall be implemented at 10:1 (mitigation plantings: impacted individuals) to cumulatively achieve the 5:1 mitigation ratio. Annual monitoring reports shall be submitted by August 31 of each year and shall include: an evaluation of current monitoring data in relation to previous population observations (during previous monitoring years) and native enhancement efforts. These reports				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
shall also include any recommendations for remedial management measures and shall discuss other issues that need to be addressed, such as trespassing or vandalism. Prior to Project construction, a Property Analysis Record (PAR) or alternatively approved costing evaluation shall be conducted to determine two cost components (1) initial and capital costs and (2) perpetual costs (endowment). Funding, as a condition of obtaining the conservation easement, shall be contributed in an amount sufficient to pay all costs for overseeing the conservation easement in perpetuity. This funding requirement includes but is not limited to, staff time, biological survey costs, monitoring and reporting, conducting weed removal, and other management activities required under the terms of the conservation easement, the CMP and the SMLMMP. The funding amount shall be subject to approval of the conservation easement holder. A separate endowment fund shall also be created by the owner/developer that shall be held by the conservation easement holder. This endowment fund shall be established in an amount that is calculated to provide, in ten years, the conservation easement holder with sufficient funds for ongoing monitoring and management of the conservation easement in perpetuity. The intent of the conservation easement shall be to protect, in perpetuity, viable native habitat that can support not just the known populations of slender mariposa lily and Peirson's morning-glory, but also the translocated slender mariposa lily populations, along with the other native plant and wildlife species that occur in the conserved coastal sage scrub habitat.				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
MM 5.3-2: Worker Education and Awareness Program. Prior to issuance of grading permits for the Project, the Project Developer shall fund the development of a worker education awareness program (WEAP) by a County-approved biologist for the Project and submit the WEAP to the County of the Los Angeles Department of Regional Planning for review and approval. The WEAP shall be attended by all individuals involved in construction of the Project prior to working on the Project and shall include, but not be limited to, the following: • Natural history and photographs of special-status plant species and special-status wildlife species, current sensitivity status, reasons for decline, and protective measures relevant to the species and habitats; • Description of sensitive vegetation communities and jurisdictional resources and associated construction-limit staking, and biological monitoring during vegetation clearing and grading activities; • Active nesting birds and associated set-back work buffers in accordance with federal and state regulations; • Litter guidelines including direction not to litter and to pick up and store all trash and litter securely at the construction site at the end of each day; and • Avoidance of driving over or otherwise disturbing areas outside the designated construction areas. • The WEAP shall be submitted to the County of Los Angeles Department of Regional Planning for review and approval 30 days prior to implementation. Prior to entering the Project site for construction work, all workers shall attend the WEAP. Upon completion of	A. Project Developer shall fund the development of a worker education awareness program (WEAP). B. WEAP shall be submitted to the LACDRP for review and approval 30 days prior to implementation. C. Maintain log demonstrating compliance.	Prior to issuance of grading permits.	Applicant	• LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
the WEAP, attendees shall sign training attendance sheets.				
MM 5.3-3: Construction Fencing. Prior to commencement of any ground-disturbing activities, construction fencing shall be installed to identify the limits of grading/disturbance as well as buffer areas, which would reduce potential human trampling outside of the construction limits and minimize the potential spread of non-native weeds or invasive plants. A County-approved biologist shall inspect construction fencing once installation is complete.	A. Inspection by a County-approved biologist. B. Maintain log demonstrating compliance.	Prior to commencement of any ground-disturbing activities.	Applicant/ Construction Manager	• LACDRP
MM 5.3-4: Weed Control Plan. Prior to the issuance of grading permits, the Project Developer shall retain a County-approved, qualified restoration ecologist or biologist to prepare a comprehensive adaptive Weed Control Plan (WCP) to be implemented during the construction and operation of the Project and submit the WCP to the County of Los Angeles Department of Regional Planning for review and approval. The Project's homeowner's association shall implement the WCP within the landscaped areas of the Project to minimize weed invasion into open space areas. The WCP shall include, but not be limited to, the following: • Weed control treatments shall include legally permitted herbicide, manual, and mechanical methods approved for application. The application of herbicides shall comply with state and federal laws and regulations under the prescription of a Pest Control Advisor, with the concurrence of the County of Los Angeles Department of Regional Planning, and shall be implemented by a Licensed Qualified Applicator. Herbicides shall not be applied during or within 72 hours of a forecasted measurable rain	A. Developer shall retain a County-approved, qualified restoration ecologist or biologist. B. Prepare a comprehensive adaptive Weed Control Plan (WCP). C. Submit the WCP to the County of LACDRP for review and approval. D. Maintain log demonstrating compliance.	Prior to the issuance of grading permits.	Applicant	• LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
event or during high wind conditions that could cause spray drift onto native vegetation. Where manual or mechanical methods are used, plant debris shall be disposed of at an appropriate off-site location. The timing of the weed control treatment shall be determined for each plant species with the goal of controlling populations before they start producing seeds. Consultation with a County-approved, qualified wildlife biologist or botanist shall be required prior to weed control treatments to develop strategies to avoid any adverse impacts to plants and wildlife in the area; • Invasive plant species (designated by California Invasive Plant Council) shall not be included in the landscaping plan as they could establish off-site and have negative impacts to the adjacent habitats; • All seeds and straw materials used during Project construction and operation shall be weed-free rice straw or other weed-free product, and all gravel and fill material shall be weed free. If straw wattles are used, they shall not be encased in plastic mesh. All plant materials used during restoration shall be native, certified weed-free, and approved by the County Department of Regional Planning; and • Prior to entry to the Project area for the first time, equipment must be free of soil and debris on tires, wheel wells, vehicle undercarriages, and other surfaces (a high-pressure washer and/or compressed air may be used to ensure that soil and debris are completely removed). Compliance with the provision is achieved by on-site inspection and verification or by demonstrating that the vehicle or equipment has been cleaned at a commercial vehicle or appropriate truck washing facility. In				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
addition, the interior of equipment (cabs, etc.) must be free of mud, soil, gravel and other debris (interiors may be vacuumed or washed).				
MM 5.3-5: Landscaping Plan. Prior to the issuance of grading permits, the Project Developer shall prepare a Landscaping Plan for the homeowner association (HOA)-maintained areas and submit the Landscaping Plan to the County of Los Angeles Department of Regional Planning for review and approval. The Landscaping Plan for the HOA-maintained areas shall include, but not be limited to, the following: • Plant species list including scientific name, common name, plant container size, and quantities; • Plantings shall be in accordance with the County of Los Angeles Fire Department Fuel Modification Guidelines (Los Angeles County Fire Department 2011) • Invasive plant species (designated by California Invasive Plant Council) shall not be included in the Landscaping Plan as they could establish off-site and have negative impacts to the adjacent habitats; • Plant layout indicating the location of the plant species; • Planting notes to include plant installation requirements such as mulch requirements; and • Where native species are required, the species shall be indigenous native species of the region (locally indigenous native species).	A. Prepare a Landscaping Plan. B. Submit the Landscaping Plan to LACDRP for review and approval. C. Implement Landscaping Plan.	Prior to the issuance of grading permits.	Applicant	• LACDRP • LACFD
MM 5.3-6: Fire Protection Plan. Prior to the issuance of grading permits, the Project Developer shall prepare a Fire Protection Plan (FPP) that meets County Fire Department requirements and submit the FPP to the	A. Prepare a Fire Protection Plan (FPP). B. Submit the FPP to LACDRP for review and approval.	Prior to the issuance of grading permits.	Applicant	• LACDRP • LACFD

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
County of Los Angeles Department of Regional Planning for review and approval. The FPP shall include, but not be limited to, the following: • All construction equipment shall be equipped with appropriate spark arrestors and carry fire extinguishers; • Provisions for fire/emergency services access if roadway blockage occurs due to large loads during construction; and • Cleared, maintained parking areas shall be designated; no parking shall be allowed in non-designated areas.	C. Implement approved FPP.			
MM 5.3-7: Biological Monitoring. Prior to the issuance of grading permits, the Project Developer shall submit the qualifications of the biologists to the County of Los Angeles Department of Regional Planning for review and approval. The Project Developer shall fund a County-approved Biological Monitor during Project construction to monitor construction activities and to ensure compliance with all mitigation measures. The Biological Monitor shall be present on site during all vegetation removal and during all of the initial ground disturbance activities for all aspects of the Project and shall regularly inspect the Project site as needed after the initial ground disturbances to ensure that all mitigation measures are being implemented. The Biological Monitor shall ensure that wildlife do not become entrapped in excavations. Safeguards shall be implemented during daytime periods of non-activity and overnight, such as placing a platform over the entire excavation site, flush with the ground surface, installing escape ramps in trenches, or exclusionary fencing. Shall relocation be required; construction shall be halted until the Biological Monitor	A. Submit the qualifications of the biologists to LACDRP for review and approval. B. Biological Monitor on site during all vegetation removal and during all of the initial ground disturbance activities. C. Maintain log demonstrating compliance.	Prior to the issuance of grading permits/ During Construction.	Applicant/ Construction Manager/ Qualified Biologist	• LACDRP • CDFW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
arrives on site and clears the work area (in compliance with all applicable permits and authorizations).				
MM 5.3-8: Reptile Pre-construction Survey and Relocation. Prior to the issuance of grading permits, the Project Developer shall submit the qualifications of the biologists to the County of Los Angeles Department of Regional Planning for review and approval. Within thirty days prior to ground-disturbance activities associated with construction or grading activities for the Project, suitable habitat shall be surveyed to capture and relocate California legless lizard, Blainville's horned lizard, and San Diegan tiger whiptail individuals. A qualified biologist in possession of a valid California Scientific Collecting Permit shall conduct the survey. The survey shall be timed to maximize capture of individual lizards, and include a spring survey if construction is planned to begin in the spring or a late summer or fall survey if construction is planned to begin in the winter. Additional pre-construction clearance surveys shall be conducted such that no more than fourteen days have elapsed between conclusion of the survey and the commencement of construction activities. Any California legless lizard, Blainville's horned lizard, and/or San Diegan tiger whiptail observed within the grading area shall be relocated to a suitable area within the preservation area and outside of the construction zone.	A. Submit the qualifications of the biologists to LACDRP for review and approval. B. Conduct reptile pre-construction survey and relocation. C. Maintain log demonstrating compliance.	Prior to the issuance of grading permits/ Within 30 days prior to ground disturbing activities.	Applicant/ Construction Manager/ Qualified Biologist	• LACDRP • CDFW
MM 5.3-9: Pre-construction Nesting Bird Survey. Prior to the issuance of grading permits, the Project Developer shall submit the qualifications of the biologists to the County of Los Angeles Department of Regional Planning (LACDRP) for review and approval. Within thirty days of ground-disturbing activities associated with construction or grading for the Project that would occur during the nesting/breeding season of native bird species	A. Submit the qualifications of the biologists to LACDRP for review and approval. B. Conduct pre-construction nesting bird survey. C. Maintain log demonstrating compliance.	Prior to the issuance of grading permits/ Within 30 days prior to ground disturbing activities.	Applicant/ Construction Manager/ Qualified Biologist	• LACDRP • CDFW • USFWS

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
potentially nesting on the site (typically February 15 but as early as January 1 for some raptors through September 15 in the Project region, or as determined by a County-approved biologist), suitable habitat shall be surveyed within seven days prior to initiation of disturbance work by a County-approved biologist to determine if active nests (actively breeding or nesting) of bird species protected by the Migratory Bird Treaty Act and/or the CFGC are present in the disturbance zone or within 300 feet (500 feet for raptors) of the disturbance zone. If initiation of ground-disturbing activities is delayed, then additional pre-disturbance surveys shall be conducted such that no more than seven days will have elapsed between the survey and ground-disturbing activities. If active nests are found, clearing and construction within 300 feet of the nest (500 feet for raptors) shall be postponed or halted. At the discretion of the County-approved biologist, a no work buffer zone shall be established suitable to the particular bird species and location of the nest until the nest is vacated and juveniles have fledged, as determined by the County-approved biologist, and there is no evidence of a second attempt at nesting. Limits of construction to avoid an active nest shall be established in the field with flagging, fencing, or other appropriate barriers, and construction personnel shall be instructed on the sensitivity of nest areas. The County-approved biologist shall serve as a construction monitor during those periods when construction activities will occur near active nest areas to ensure that no inadvertent impacts to these nests occur. The results of the surveys, showing the locations of any active nests detected, and documentation of any avoidance measures taken, shall be submitted to the County				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
Department of Regional Planning to document compliance with applicable State and federal laws.				
MM 5.3-10: Pre-construction Burrowing Owl Survey. Prior to the issuance of grading permits, the Project Developer shall submit the qualifications of the biologists to the County of Los Angeles Department of Regional Planning for review and approval. Not less than 14 days prior to construction ground-disturbing activities, a survey for burrowing owls shall be conducted by a County-approved biologist within appropriate habitat, and in accordance with approved methodologies (CDFG 2012). If burrowing owls are found on the Project site, and pursuant to agency guidelines, a protective buffer shall be established around the occupied burrow(s) and no ground-disturbing activities shall be permitted within the buffer area (CDFG 2012). The size of the buffer shall be determined as set forth in the Staff Report on Burrowing Owl Mitigation (CDFG 2012), based on the disturbance level of construction activities, whether the owl(s) are present during the breeding season (February 1 through August 31) or nonbreeding season (September 1 through January 31), and as determined by the County-approved biologist. The protective buffer around active burrows shall be maintained until the County approved biologist verifies that the birds have vacated the burrow(s) and left the site.	A. Submit the qualifications of the biologists to LACDRP for review and approval. B. Conduct pre-construction Burrowing Owl survey. C. Maintain log demonstrating compliance.	Prior to the issuance of grading permits/ Within 14 days prior to ground disturbing activities.	Applicant/ Construction Manager/ Qualified Biologist	• LACDRP • CDFW
MM 5.3-11: Pre-construction Surveys for San Diego Black-Tailed Jackrabbit. Prior to the issuance of grading permits, the Project Developer shall submit the qualifications of the biologists to the County of Los Angeles Department of Regional Planning for review and approval. Within thirty days prior to construction activities in grassland, scrub, chaparral, oak woodland,	A. Submit the qualifications of the biologists to LACDRP for review and approval. B. Conduct pre-construction San Diego black-tailed jackrabbit survey.	Prior to the issuance of grading permits/ Within 30 days prior to ground disturbing activities.	Applicant/ Construction Manager/ Qualified Biologist	• LACDRP • CDFW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
or other suitable habitat, a County-approved biologist shall conduct a survey within the proposed construction disturbance zone and within 200 feet of the disturbance zone, within the limits of the Project site, for San Diego black-tailed jackrabbit. If San Diego black-tailed jackrabbits are present, non-breeding rabbits shall be flushed from areas to be disturbed. Dens, depressions, nests, or burrows occupied by pups shall be flagged and ground-disturbing activities shall avoid the area within 200 feet of these occupied areas during the pup-rearing season (February 15 through July 1). This buffer may be reduced based on the location of the den upon consultation with the California Department of Fish and Wildlife (CDFW). Occupied maternity dens, depressions, nests, or burrows shall be flagged for avoidance, and a biological monitor shall be present during construction. If unattended young are discovered, they shall be relocated to suitable habitat by a County-approved biologist. The Project Developer shall document all San Diego black-tailed jackrabbit identified, avoided, or moved and provide a written report to CDFW within 72 hours of identification, avoidance or movement. Collection and relocation of animals shall only occur with the proper scientific collection and handling permits.	C. Maintain log demonstrating compliance.			
MM 5.3-12: Pre-construction Surveys for American Badger. Prior to the issuance of grading permits, the Project Developer shall submit the qualifications of the biologists to the County of Los Angeles Department of Regional Planning for review and approval. Within thirty days prior to construction activities in grassland, scrub, chaparral, oak woodland, or other suitable habitat, a County approved biologist shall conduct a survey within the proposed construction disturbance zone and within	A. Submit the qualifications of the biologists to LACDRP for review and approval. B. Conduct pre-construction American Badger survey. C. Maintain log demonstrating compliance.	Prior to the issuance of grading permits/ Within 30 days prior to ground disturbing activities.	Applicant/ Construction Manager/ Qualified Biologist	• LACDRP • CDFW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
200 feet of the disturbance zone, within the limits of the Project site, for American badger. If American badgers are present, occupied habitat shall be flagged and ground-disturbing activities shall avoid the area within 50 feet of the occupied den. Maternity dens shall be avoided during the pup-rearing season (February 15 through July 1) and a minimum 200-foot buffer established. This buffer may be reduced based on the location of the den upon consultation with the California Department of Fish and Wildlife (CDFW). Maternity dens shall be flagged for avoidance, identified on construction maps, and a County-approved biologist shall be present during construction. If avoidance of a non-maternity den is not feasible, badgers shall be relocated either by trapping or by slowly excavating the burrow (either by hand or mechanized equipment under the direct supervision of the biologist, removing no more than four inches at a time) before or after the rearing season (February 15 through July 1). Any relocation of badgers shall occur only after consultation with CDFW. A written report documenting the badger removal shall be provided to CDFW within 30 days of relocation. Collection and relocation of animals shall only occur with the proper scientific collection and handling permits.				
MM 5.3-13: Pre-construction Surveys for San Diego Desert Woodrat. Prior to the issuance of grading permits, the Project Developer shall submit the qualifications of the biologists to the County of Los Angeles Department of Regional Planning for review and approval. Within thirty days prior to construction activities in grassland, scrub, chaparral, oak woodland, or other suitable habitat, a County-approved biologist shall conduct a survey within the proposed construction disturbance zone and within 200 feet of the disturbance	A. Submit the qualifications of the biologists to LACDRP for review and approval. B. Conduct pre-construction San Diego desert woodrat survey. C. Maintain log demonstrating compliance.	Prior to the issuance of grading permits/ Within 30 days prior to ground disturbing activities.	Applicant/ Construction Manager/ Qualified Biologist	• LACDRP • CDFW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
zone, within the limits of the Project site, for San Diego desert woodrat. If active San Diego desert woodrat nests (stick houses) are identified within the disturbance zone or within 100 feet of the disturbance zone, a fence shall be erected around the nest site adequate to provide the woodrat sufficient foraging habitat at the discretion of the County-approved biologist in consultation with the California Department of Fish and Wildlife (CDFW). Clearing and construction within the fenced area shall be postponed or halted until young have left the nest. The biologist shall serve as a construction monitor during those periods when disturbance activities occur near active nest areas to ensure that no inadvertent impacts to these nests occur. If avoidance is not possible, the Project Developer shall take the following sequential steps: (1) all understory vegetation shall be cleared in the area immediately surrounding active nests followed by a period of one night without further disturbance to allow woodrats to vacate the nest, (2) each occupied nest shall then be disturbed by a County-approved biologist until all woodrats leave the nest and seek refuge off site, and (3) the nest sticks shall be removed from the Project site and piled at the base of a nearby hardwood tree (preferably a coast live oak or Southern California black walnut). Relocated nests shall not be spaced closer than 100 feet apart, unless a County-approved biologist has determined that a specific habitat can support a higher density of nests. The Project Developer shall document all woodrat nests moved and provide a written report to the California Department of Fish and Wildlife (CDFW). All woodrat relocation shall be conducted by a County-approved biologist in possession of a scientific collecting permit.				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
MM 5.3-14: Homeowner Association Covenants, Conditions & Restrictions. Prior to the issuance of grading permits, the Project Developer shall submit the homeowner association Covenants, Conditions & Restrictions to the County of Los Angeles Department of Regional Planning for review and approval. The homeowner association Covenants, Conditions & Restrictions shall include the following requirements to reduce potential human impacts on adjacent habitats and wildlife species: • All dogs and cats shall be in compliance with requirements found in Sections 10.20.150 through 10.20.350 of the Los Angeles County Code related to appropriate licensing and tagging, leashed animals when appropriate, ensuring that all dogs and cats are neutered or spayed (or an unaltered license in accordance with Los Angeles County Code), and that all dogs and cats have a microchip. • Smoking shall be prohibited in open space areas. • Speed limits shall be posted, and the Covenants, Conditions & Restrictions shall require residents to comply with the posted speed limits. • Balloons shall not be utilized by the homeowner association for any community events and the use of balloons by individual homeowners shall be discouraged. • Homeowner reprisals against native wildlife species (i.e., killing or harming native wildlife species in any way) if homeowner pets are killed or harmed by wildlife shall be prohibited. • Second-generation anticoagulant rodenticide use shall be prohibited.	Submit the homeowner association Covenants, Conditions & Restrictions to LACDRP for review and approval.	Prior to the issuance of grading permits.	Applicant	• LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
• Second-generation anticoagulant rodenticide use shall be prohibited.				
MM 5.3-15: Trash Receptacles. Trash and garbage shall be controlled in areas adjacent to development with waste and recycling receptacles that discourage wildlife foraging in common areas/parks.	Maintain log demonstrating compliance.	During construction.	Construction Manager	• LACDRP
MM 5.3-16: Lighting. All lighting along the perimeter of natural areas shall be downcast luminaries with light patterns directed away from natural areas.	Maintain log demonstrating compliance.	During construction.	Construction Manager	• LACDRP
MM 5.3-17: Palmer's Goldenbush Scrub Mitigation. Prior to the issuance of grading permits, to offset the Project's 6.7 acres of direct impacts to Palmer's goldenbush scrub, compensatory mitigation is required. Subject to County of Los Angeles Department of Regional Planning approval, there shall be a no net loss of Palmer's goldenbush scrub (1:1) shall include one of the following measures (Note that #1 below is the preferred mitigation option. #2, #3, #4, or #5 will be implemented if #1 is not feasible).: 1. **On-site in-kind preservation (0.2:1), on-site out-of-kind preservation (5:1), and off-site in-kind creation/enhancement (1:1)**: In addition to the on-site preservation of existing 1.4 acres of Palmer's goldenbush scrub and on-site habitat preservation of existing 31.9 acres of native scrub (not including Palmer's goldenbush scrub) through establishment of a conservation easement of the Off-Site Open Space Dedication Area through **MM 5.3-1 Conservation Easement**, the Project Developer shall implement the following: • Off-site in-kind creation/enhancement of Palmer's goldenbush scrub at a property with	Maintain log demonstrating compliance.	Prior to the issuance of grading permits.	Applicant/ Construction Manager	• LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
suitable Palmer's goldenbush scrub habitat, such as the Land Veritas Curtis Property. A conservation easement will be recorded over the property and a total of 6.7 acres of Palmer's goldenbush scrub shall be created/enhanced. As part of the recording of the conservation easement, a Conservation Management Plan (CMP) shall be prepared that specifically identifies the required resource management activities and the entities that shall be responsible for managing those activities in perpetuity. The CMP shall identify Palmer's goldenbush scrub creation/enhancement methods, maintenance frequency, monitoring methods and frequency, success criteria, and reporting requirements. **Alternative Palmer's Goldenbush Scrub Mitigation if Preferred Palmer's Goldenbush Scrub Mitigation #1 is not feasible.** 2. **On-site in-kind preservation (0.2:1), on-site out-of-kind preservation (5:1), and off-site out-of-kind preservation (5:1)**: In addition to the on-site preservation of existing 1.4 acres of Palmer's goldenbush scrub and on-site habitat preservation of existing 31.9 acres of native scrub (not including Palmer's goldenbush scrub) through establishment of a conservation easement of the Off-Site Open Space Dedication Area through **MM 5.3-1 Conservation Easement**, the Project Developer shall implement the following:				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
• Purchase of out-of-kind native scrub mitigation credits at an off-site mitigation bank, such as the Land Veritas Petersen Ranch, for the preservation of 33.5 acres of out-of-kind native scrub habitat, effectively mitigating for impacts to 6.7 acres of Palmer's goldenbush scrub through off-site out-of-kind preservation of native scrub at 5:1. Or, establishment of a deed restriction at an off-site property in Los Angeles County for the preservation of 33.5 acres of out-of-kind native scrub habitat, effectively mitigating for impacts to 6.7 acres of Palmer's goldenbush scrub through off-site out-of-kind preservation of native scrub at 5:1. 3. **On-site in-kind creation (1:1) and in-kind and out-of-kind preservation (0.2:1 and 5:1) (Total > 5.2:1)**: In addition to the on-site habitat preservation of existing 1.4 acres of Palmer's goldenbush scrub within the Off-Site Open Space Dedication Area conservation easement, the Project Developer shall implement the following: • Creation of 6.7 acres of Palmer's goldenbush in the open space areas within the VTTM site (1:1). • Establishment of a conservation easement where 31.9 acres of native scrub (a minimum of 0.2:1 in-kind and up to 5:1 out-of-kind) will be preserved in perpetuity. 4. **On-site in-kind creation/enhancement and/or preservation (1:1) and in-kind and out-of-kind preservation (0.2:1 and 5:1) (Total > 5.2:1):** In addition to the on-site habitat preservation of existing 1.4 acres of Palmer's goldenbush scrub, the				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
Project Developer will commit to the following: • Creation/enhancement of Palmer's goldenbush within portions of the proposed Off-Site Open Space Dedication Area conservation easement and/or open space areas within the VTTM site and/or preservation of existing native scrub alliance(s) with Palmer's goldenbush scrub association within portions of the proposed Off-Site Open Space Dedication Area conservation easement to total 6.7 acres (1:1). • Establishment of a conservation easement where 31.9 acres of native scrub (a minimum of 0.2:1 in-kind and up to 5:1 out-of-kind*) will be preserved in perpetuity. *The acreage of Palmer's goldenbush scrub association(s) would count towards in-kind preservation. 5. **On-site in-kind creation/enhancement and/or preservation (1:1) and in-kind and out-of-kind preservation (0.2:1 and 5:1), plus off-site in-kind creation/enhancement**: In addition to the on-site habitat preservation of existing 1.4 acres of Palmer's goldenbush scrub, the Project Developer will commit to the following: • Creation/enhancement of Palmer's goldenbush within portions of the proposed Off-Site Open Space Dedication Area conservation easement and/or open space areas within the VTTM site and/or preservation of existing native scrub alliance(s) with Palmer's goldenbush scrub association within portions of the proposed Off-Site Open Space Dedication Area conservation easement to total 6.7 acres (1:1). • Establishment of a conservation easement				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
where 31.9 acres of native scrub (a minimum of 0.2:1 in-kind and up to 5:1 out-of-kind*) will be preserved in perpetuity. *The acreage of Palmer's goldenbush scrub association(s) would count towards in-kind preservation. • If on-site in-kind creation/enhancement and/or preservation and in-kind and out-of-kind preservation do not achieve a total of 3:1, off-site in-kind habitat creation/enhancement will be incorporated to achieve at total of 3:1. Off-site in-kind creation/enhancement of Palmer's goldenbush scrub at a mitigation bank, such as Land Veritas Curtis Property, Los Angeles County, Upper Santa Clara River Mitigation Site, will be established with an acreage appropriate to achieve a total of 3:1 mitigation.				
MM 5.3-18: Agency Permit Applications. Prior to construction work in jurisdictional waters, applications for Clean Water Act (CWA) Section 404 and California Fish and Game Code (CFGC) 1602 permits shall be prepared and submitted to the regulatory agencies and the permits shall be obtained by the Project Developer. The compensatory mitigation requirements of the resource agencies shall be incorporated into the Aquatic Resource Habitat Mitigation and Monitoring Plan (refer to **MM 5.3-16**). Mitigation shall be proposed at a minimum 1:1 ratio, or as required by the permitting agencies, to preserve, enhance, or restore similar ephemeral, streambed and associated riparian, and swales for no net loss of jurisdictional aquatic resources.	Prepare and submit applications for Clean Water Act (CWA) Section 404 and California Fish and Game Code (CFGC) 1602 permits.	Prior to construction work in jurisdictional waters.	Applicant	• LACDRP • CDFW • USACE
MM 5.3-19: Aquatic Resource Habitat Mitigation and Monitoring Plan. Prior to the issuance of grading permits, an Aquatic Resource Habitat Mitigation and	A. Develop Aquatic Resource Habitat Mitigation and Monitoring Plan (HMMP).	Prior to the issuance of grading permits.	Applicant	• LACDRP • USFWS • RWQCB

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
Monitoring Plan (HMMP) shall be developed in coordination with preparation of the agency permit applications and shall be approved by the regulatory agencies and County of Los Angeles. The Aquatic Resource HMMP shall provide details on the proposed mitigation for impacts to jurisdictional resources present within the Project site including a minimum 1:1 mitigation ratio, or as required by the permitting agencies, to preserve similar ephemeral, streambed and associated riparian, and swales for no net loss of jurisdictional aquatic resources. The Aquatic Resource HMMP shall include an overview of the mitigation strategy for impacts to sensitive vegetation as well as specific mitigation locations proposed within off-site areas, including mitigation banks credits (i.e., Santa Paula Creek Mitigation Bank) and conservation lands, if applicable. The Aquatic Resource HMMP shall include maintenance and monitoring requirements, performance standards, success criteria, and contingency measures, which shall guide the management of the mitigation program and provide the metrics for the determination of success of the Project mitigation. The U.S. Fish and Wildlife Service, Regional Water Quality Control Board, California Department of Fish and Wildlife, and County shall review and approve the Aquatic Resource HMMP prior to implementation, ensuring the requirements of these agencies are met and that the Project is consistent with agency policy, permit requirements, and conditions of approval.	B. Submit Aquatic Resource HMMP to USFWS, RWQCB, CDFW, and LACDRP for review and approval. C. Implement approved Aquatic Resource HMMP. D. Maintain log demonstrating compliance.			• CDFW
MM 5.3-20: Off-Site Water Tank Area Oak Woodland Mitigation and Oak Tree Mitigation. Prior to the issuance of grading permits, in accordance with the Oak Woodlands Conservation Management Plan Guide	Implement the Off-Site Water Tank Area oak woodland mitigation measure and oak tree mitigation.	Prior to the issuance of grading permits.	Applicant	• LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
(County 2011, 2014), to offset the Project's total combined significant impact of 0.61 acres of oak woodland canopy in OW2 and OW3 and, in accordance with the County Oak Tree Ordinance to offset the Project's impacts to 12 protected oak trees at the Off-Site Water Tank Area, one of the following mitigation measures shall be implemented, subject to County approval: 1. Purchase mitigation credits for 1.22 acres of oak woodlands from an off-site oak woodland habitat preservation area owned by a third party; or 2. Contribute to the Los Angeles County's Oak Forests Special Fund in an amount of $97,040 (two times the canopy cover area value).				
MM 5.3-21: Oak Plantings in VTTM site Fuel Modification Zone C. A total of 12 coast live oak (*Quercus agrifolia*) trees shall be planted, maintained, monitored, and reported on within the VTTM site. The 12 coast live oak trees shall be locally sourced (from nursery stock grown from locally sourced acorns, or from acorns gathered locally, preferably from the same watershed in which they were planted) 1-gallon oak trees planted on preferably north-facing slopes within the northwest corner of the VTTM site in Fuel Modification Zone C on non-graded slopes within natural open space, avoiding native habitat disturbance. The planted trees shall be subject to a 7-year monitoring period by an independent third-party certified arborist. This monitoring effort shall consider growth, health, and condition of the subject trees to evaluate success. The monitoring efforts shall result in recommendations of remedial actions should any of the tree plantings exhibit poor or declining health.	Maintain log demonstrating compliance.	7-year monitoring period.	Applicant/ Certified Arborist	• LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
MM 5.3-22: Tree Protection Measures. To prevent damage to any protected trees that would be avoided during Project construction, the following measures shall be implemented by the Project Developer for any such trees within 20 feet of an active construction area: **Pre-Construction** **Fencing:** Chain-link fencing, no less than 4 feet high, with tree protection signs shall be erected around all undisturbed trees (or tree groups). The protective fence shall be installed at the protected zone boundary of each tree (or tree group), which is defined as 5 feet beyond the tree canopy dripline, or 1.5 feet per inch of trunk diameter, whichever is greater. The intent of protection fencing is to prevent root damage and/or compaction by grading equipment. An ISA-certified arborist may be required on site if grading activities occur within the tree's protected zone. The fencing shall be secured to 6-foot, heavy-gauge T-bar line posts, pounded in the ground a minimum of 18 inches and spaced a minimum of 8 feet on-center. Fencing shall be attached to T-bar posts with minimum 14-gauge wire fastened to the top, middle, and bottom of each post. Tree protection signs shall be attached to every fourth post. The contractor shall maintain the fence to keep it upright, taut, and aligned at all times. Fencing shall be removed only after all construction activities in the vicinity of the affected tree(s) are complete. **Pre-construction Meeting:** A pre-construction meeting shall be held between all contractors (including grading, tree removal/pruning, and builders) and an ISA-certified arborist. The meeting shall focus on instructing the contractors on tree protection practices and answering any questions. All equipment operators and spotters, assistants, or those directing operators from the ground	A. Set up fencing and tree protection signs. B. Hold pre-construction meeting. C. Provide written acknowledgement of receiving tree protection training. D. Maintain documentation demonstrating compliance.	Pre-Construction/ During Construction/ Post-Construction.	Applicant/ Construction Manager/ Certified Arborist	• LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
shall provide written acknowledgement of receiving tree protection training. This training shall include information on the location and marking of protected trees, the necessity of preventing damage, and the discussion of work practices that shall accomplish these tasks. **During Construction** Once construction activities have begun, the following protection measures shall be followed. **Equipment Operation and Storage:** Contractors shall avoid heavy equipment operation around the protected trees. Operating heavy machinery around the root zones of trees will increase soil compaction, which decreases soil aeration and subsequently reduces water penetration into the soil. All heavy equipment and vehicles shall, at minimum, stay out of the fenced protected tree zone unless where specifically approved in writing and under the supervision of an ISA-certified arborist or their representative. **Materials Storage and Disposal:** Contractors shall not store or discard any supplies or materials, including paint, lumber, and concrete overflow, within the protected zone and shall remove all foreign debris within the protected zone. However, the contractors shall leave the duff, mulch, chips, and leaves around the retained trees for water retention and nutrient supply. In addition, the contractors shall avoid draining or leakage of equipment fluids near retained trees. Fluids such as gasoline, diesel, oils, hydraulics, brake and transmission fluids, paint, paint thinners, and glycol (anti-freeze) shall be disposed of properly. The contractors shall ensure that equipment be parked at least 50 feet from the protected zone to avoid the possibility of leakage of equipment fluids into the soil. The effect of toxic				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
equipment fluids on the retained trees could result in tree decline and/or mortality. **Grade Changes:** Contractors shall ensure that grade changes, including adding fill, shall not be permitted within the protected zone without special written authorization and under supervision by an ISA-certified arborist or their representative. Lowering the grade within the protected zone would necessitate cutting main support and feeder roots, jeopardizing the health and structural integrity of the trees. Adding soil, even temporarily, on top of the existing grade would compact the soil further and decrease water and air availability to the tree roots. Contractors shall ensure that grade changes made outside of the protected tree zone shall not create conditions that allow water to pond at the base of the tree. Water trapped at the base of a tree could lead to root rot and other detrimental tree impacts. **Moving Construction Materials:** Contractors shall ensure that care be exercised when moving construction equipment or supplies near the undisturbed oak trees, especially overhead. Contractors shall ensure that damage to the trees shall be avoided when transporting or moving construction materials and working around the tree (even outside of the fenced protected zone). Contractors shall flag aboveground tree parts that could be damaged (e.g., low limbs, scaffold branches, and trunks) with high-visibility flagging, such as florescent red or orange. If contact with the tree crown is unavoidable, conflicting branches may be pruned by an ISA-certified tree worker under supervision by an ISA-certified arborist or their representative and shall adhere to ISA standards. **Trenching:** Except where specifically approved in writing				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
beforehand, all trenching shall be outside of the fenced protected zone. Roots primarily extend in a horizontal direction, forming a support base to the tree similar to the base of a wine glass. Where trenching is necessary in areas that contain roots from retained trees, contractors shall use trenching techniques that include the use of either a root pruner (Dosko root pruner or equivalent) or an Air-Spade to limit root impacts. An ISA certified arborist or their representative shall ensure that all pruning cuts be clean and sharp to minimize ripping, tearing, and fracturing of the root system. Root damage caused by backhoes, earthmovers, dozers, or graders is severe and may result in tree mortality. Use of both root-pruning and Air-Spade equipment shall be accompanied only by hand tools to remove soil from trench locations. The trench shall be made no deeper than necessary. **Irrigation:** Irrigation of native protected trees retained on site shall seek to mimic natural rainfall patterns in Southern California. Supplemental irrigation for trees adjacent to construction activity may be necessary during winter or spring months. Summer and fall irrigation may be necessary based on variable climatic and site conditions, but should be conducted judiciously to avoid overwatering. One irrigation cycle shall thoroughly soak the root zones of the trees to a depth of 3 feet. The soil should be allowed to dry out between watering to avoid keeping a consistently wet soil. The contractor shall be responsible for irrigating (deep watering) the trees. Soil moisture shall be checked with a soil probe before irrigating. Irrigation is best accomplished by installing a temporary aboveground microspray system that would distribute water slowly (to avoid runoff) and evenly throughout the fenced protection zone. Overwatering of native oaks may				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
promote the growth of tree damaging agents, such as oak root fungus, so proper soil moisture monitoring is critical to prolonged tree health. For any trees that have been substantially root pruned (30% or more of their root zone), irrigation shall be required for the first 12 months. The first irrigation shall occur within 48 hours of root pruning. The tree(s) should be deep watered every 2 weeks during the summer and once a month during the winter (adjust accordingly with rainfall). **Canopy Pruning:** The contractor shall not prune trees until all construction is completed unless standard pruning would reduce conflict between canopy and equipment. This will help protect the tree canopies from damage. All pruning shall be conducted by an ISA-certified tree worker under supervision by an ISA certified arborist or their representative, and shall adhere to ISA pruning standards. **Canopy Washing:** During construction, the contractor shall wash the foliage of trees adjacent to construction activity with a strong water stream every 2 weeks before 10:00 a.m. to control mite and insect populations. **Inspection:** An ISA-certified arborist or their representative shall inspect the preserved trees adjacent to grading and construction activity on a monthly basis for the duration of the proposed project's construction period. A report summarizing site conditions, observations, tree health, and recommendations for minimizing tree damage shall be submitted by the ISA-certified arborist or their representative following each inspection. **Post Construction** Following the completion of the construction activity within 20 feet of the protected zones of undisturbed oaks, the tree protection fencing may be removed, and				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
the following measures may be performed to sustain and enhance the vigor of the trees: **Mulch:** The contractors shall ensure that the natural duff layer under all trees is maintained. This would stabilize soil temperatures in root zones, conserve soil moisture, and reduce erosion. The contractors shall ensure that the mulch is kept clear of the trunk base to avoid creating conditions favorable to the establishment and growth of decay-causing fungal pathogens. Should it be necessary to add organic mulch under retained protected trees, packaged or commercial mulch shall not be used because it may contain oak root fungus. Also, the use of redwood chips shall be avoided because certain inhibitive chemicals may be present in the wood. Other wood chips and crushed walnut shells can be used, but the best mulch that provides a source of nutrients for the tree is its own leaf litter. Any organic mulch added by the contractor shall be applied to a maximum depth of 4 inches where possible. **Pruning:** Regular pruning of the trees is not required. An ISA certified tree worker, under the supervision of an ISA-certified arborist or their representative, shall only prune trees to maintain clearance and remove broken, dead, or diseased branches. No more than 15% of the canopy shall be removed at one time. All pruning shall conform to ISA standards. **Watering:** The trees should not require regular irrigation, other than the 12 months following substantial root pruning, if applicable. However, soil probing shall be necessary to accurately monitor moisture levels. Supplemental irrigation for the trees that sustained root pruning and any newly planted trees may be necessary, especially in years with low winter rainfall. **Watering Adjacent Plant Material:** All plants near the				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
trees shall require moderate to low levels of water. The contractor shall infrequently water surrounding plants with deep soaks, rather than frequent light irrigation, and allow them to dry out between watering. The soil shall not be allowed to become saturated or stay continually wet, and drainage should not allow ponding of water beneath the canopy of the oak trees. Irrigation spray shall not hit the trunk of any tree. The contractor shall maintain a 30- inch dry zone around all tree trunks. An aboveground microspray irrigation system shall be used in lieu of typical underground pop-up sprays. **Chemical Applications:** If the trees are maintained in a healthy state, regular spraying for insect or disease control would not be necessary. If a problem does develop, an ISA-certified arborist/licensed PCA or their representative shall be consulted since the trees may require application of insecticides to prevent the intrusion of bark-boring beetles and other invasive pests. All chemical spraying shall be performed by a licensed applicator under the direction of a licensed PCA. **Monitoring**: An ISA-certified arborist or their representative should inspect the trees retained on site for a period of 5 years following the completion of construction activity. Monitoring visits should be completed quarterly, totaling 20 visits. Following each monitoring visit, a report summarizing site conditions, observations, tree health, and recommendations for promoting tree health shall be submitted. Additionally, any tree mortality shall be noted, and any tree dying during the monitoring period shall be replaced with the same species as specified for minimum replacement standards in this oak tree report.				
MM 5.3-23: Pet Signage. Prior to Project completion, the Project Applicant shall install signage requiring pets be	Install signage.	Prior to project completion.	Applicant/ Construction	• LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
kept on leash and on trails at all times. Signage shall also include information signage for hikers encouraging clean-up after pets and discourage animal waste.			Manager	
MM 5.3-24: Wildlife Signage. Prior to Project completion, the Project Applicant shall install appropriate public information signage in the residential area and along the trail to 1) educate and inform the public about wildlife, especially mountain lions, present in the area; 2) advise on proper avoidance measures to reduce human-wildlife conflicts; 3) advise on proper use of open space trails in a manner respectful to wildlife; and 4) provide local contact information to report injured or dead wildlife. Signage shall be written in the language(s) understandable to all those likely to recreate and use the trails. Signage shall not be made of materials harmful to wildlife such as spikes or glass. In addition, the Project Application shall prepare a long-term maintenance plan to repair and replace the signs.	A. Install signage. B. Prepare long-term maintenance plan.	Prior to project completion.	Applicant/ Construction Manager	• LACDRP
MM 5.3-25: Mountain Lion Avoidance. Within one year prior to Project implementation, including site preparation, equipment staging, and mobilization, strategically placed, non-invasive remote wildlife cameras shall be deployed within the VTTM Site to detect the presence/absence of mountain lions. A report documenting the results of the camera survey, including negative findings, shall be submitted to the County and CDFW prior to initiation of Project activities. The survey report shall include measures to avoid impacts to mountain lions that may be in the area, as well as to dens and cubs, if needed, depending on the results of the camera survey. If a pregnant or lactating (i.e., engorged teats) female mountain lion's images were recorded regularly by a wildlife camera, a 2,000-foot buffer would be applied from the location of the camera station,	Submit results of survey to County and CDFW prior to initiation of Project activities.	Within one year prior to Project implementation/ Prior to initiation of Project activities.	Applicant/ Construction Manager	• LACDRP • CDFW

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
which would be assumed to be near the natal den.				
MM 5.3-26: Sensitive Species Protection Plan. Prior to issuance of grading permits and at least thirty (30) days prior to the start of vegetation removal or grading activities, a qualified biologist shall prepare a Sensitive Species Protection Plan (SSPP) for species identified in the DEIR as being potentially present on the project site, including, but not limited to San Diego desert woodrat, San Diegan whiptail, sharp-shinned hawk, oak titmouse, Costa's hummingbird, and Vaux swift. This plan shall be provided to CDFW for their review and comment, and shall be approved by LACDRP prior to the issuance of grading permits. For any measures involving proposed species relocations, the SSPP shall identify handling and relocation protocols and a minimum of two relocation sites with suitable, species-specific habitat within 0.25 miles away from the Project site, including a map of suitable relocation locations. The SSPP shall include avoidance and minimization measures as well as mitigation measures to offsite impacts to a specific species and/or its habitat. Written approval from CDFW shall be obtained when the SSPP is finalized. The SSPP shall be amended for any new species observed within or adjacent to the Project area or that CDFW determines may be impacted by Project activities. Species included in the SSPP shall include, but not be limited to, San Diego desert woodrat, San Diegan whiptail, sharp-shinned hawk, oak titmouse, Costa's hummingbird, and Vaux swift.	Prepare a Sensitive Species Protection Plan (SSPP) for CDFW review and comment.	Prior to issuance of grading permits and at least thirty (30) days prior to the start of vegetation removal or grading activities.	Qualified Biologist	• CDFW
MM 5.3-27: Pre-construction Tree Pest and Disease Survey. 1) Prior to tree removal, a certified arborist should evaluate trees for infectious tree diseases including but	A. Evaluate trees for infectious tree diseases. B. Prepare an Infectious Tree Disease Management Plan or	Prior to tree removal	Certified Arborist	• LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
not limited to sudden oak death (Phytophthora ramorum), thousand canker fungus (Geosmithia morbida), polyphagous shot hole borer (Euwallacea spp.), and goldspotted oak borer (Agrilus auroguttatus) (TCD 2021; UCANR 2021; Phytosphere Research 2012; UCIPM 2013). 2) If a certified arborist determines trees are impacted by infectious pests or diseases, the certified arborist should prepare an Infectious Tree Disease Management Plan or develop a detailed, robust, enforceable, and feasible list of preventative measures. A plan/list should provide measures relevant for each tree pest or disease observed. To avoid the spread of infectious tree pests and diseases, infected trees should not be transported from a Project site without first being treated using best available management practices described Infectious Tree Disease Management Plan or list of preventative measures. 3) If possible, all tree material, especially infected tree material, should be left on site. The material could be chipped for use as ground cover or mulch. Pruning and power tools should be cleaned and disinfected before use to prevent introducing pathogens from known infested areas, and after use to prevent spread of pathogens to new areas.	develop a detailed, robust, enforceable, and feasible list of preventative measures.			
MM 5.3-28: Mountain Lion Movement. Prior to issuance of a grading permit, to mitigate the contribution of the Project to a regional cumulative impact on mountain lion movement: (1) the subdivider shall establish a Conservation Easement over the 37.9-acre Off-Site Open Space Dedication Area and a Conservation Plan prepared and implemented to preserve coastal scrub habitat in the Off-Site Open Space Dedication Area and a 0.36-acre public trail as illustrated	A. The subdivider shall establish a Conservation Easement over the 37.9-acre Off-Site Open Space Dedication Area and a Conservation Plan and a 0.36-acre public trail. B. The subdivider shall purchase an off-site conservation easement, to	Prior to the issuance of a grading permit.	Applicant	• LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
on Vesting Tentative Tract Map No. 60257 shall be maintained in perpetuity to maintain movement opportunities for mountain lions between Chiquita Canyon and the Los Padres National Forest (please refer to MM 5.3-1); and (2) subdivider shall purchase an off-site conservation easement, to be held by a public agency or non-profit conservation planning organization, (a) covering at least 50 acres of equivalent habitat or (b) a smaller area if the following can be demonstrated: (i) within a known mountain lion corridor, or (ii) containing a riparian habitat and adjacent to a known mountain lion corridor, or (iii) within a known or modeled mountain lion movement corridor located in western Los Angeles County or eastern Ventura County, north of State Route-126 and south of the Los Padres National Forest. The conservation easement shall be recorded prior to grading permit issuance. The final size and location of the conservation easement shall be to the satisfaction of the director.	be held by a public agency or non-profit conservation planning organization.			
5.4 Cultural Resources				
MM 5.4-1: Prior to the initiation of Project-related earthmoving activities and excavation associated with each component of the Project, the Project Developer project manager or their designee shall retain a County-certified qualified archaeologist to prepare a cultural resource monitoring plan. The qualified archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738–39). The archaeologist must have knowledge of both prehistoric and historical archaeology. The cultural resource monitoring plan shall outline when and for how long monitoring shall occur, where on the site monitoring of vegetation clearing and earthmoving	A. Retain qualified archeologist. B. Prepare and implement. cultural resource monitoring plan. C. Maintain log demonstrating compliance.	Prior to the initiation of Project-related earthmoving activities and excavation.	Applicant/Cultural Resource Monitor	• LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
activities shall be required, methods of monitoring, types of artifacts anticipated, procedures for temporary stop and redirection of work to permit sampling, identification and evaluation of possible resources, procedures for additional analysis, and accommodation and procedures for Native American monitors, if any.				
MM 5.4-2: Prior to the initiation of ground-disturbing activities associated with each component of the Project, a Worker Education Training and Awareness Program shall be developed to discuss the Project's potential for impacting cultural resources. The training shall be presented by the qualified archaeologist in conjunction with representatives from the Fernandeno Tataviam Band of Mission Indians. This education/training program shall discuss the cultural resource monitoring plan including the types of artifacts and features that may be encountered, the procedures to be followed if cultural materials are unearthed at the Project site, contact information for Lead Agency and Tribal personnel, and the regulatory requirements for the protection of cultural resources. This education program shall be provided to all construction personnel (e.g., contractors, earthmoving personnel, etc.) prior to any work being done on the Project site.	Develop and implement a Worker Education Training and Awareness Program.	Prior to the initiation of ground-disturbing activities.	Applicant/ Construction Manager/ Qualified Archeologist	• LACDRP
MM 5.4-3: During Project-related earthmoving activities and excavation within the VTTM site, the Off-Site Roadway Improvement Area, and the Off-Site Water Tank Area, the construction manager shall adhere to the stipulations of the cultural resource monitoring plan. The archaeologist shall have the authority to halt any project-related activities adversely impacting potentially significant resources. During project-related construction and excavation	A. Implement cultural resource monitoring plan. B. Maintain log demonstrating compliance.	During Project-related earthmoving activities and excavation activities/ During project-related construction and excavation activities.	Applicant/ Construction Manager/ Qualified Archeologist	• LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
activities within the VTTM site, the Off-Site Roadway Improvement Area, and the Off-Site Water Tank Area, should subsurface archaeological resources be discovered, all activity within 25 feet of the find shall stop and a qualified archaeologist shall be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine, in consultation with County of Los Angeles Department of Regional Planning and the Fernandeno Tataviam Band of Mission Indians representatives, appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Methods of avoidance may include, but shall not be limited to, rerouting or redesign, cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, such as data recovery or other appropriate measures, in consultation with County of Los Angeles Department of Regional Planning and Fernandeno Tataviam Band of Mission Indians representatives. If an archaeological site does not qualify as a historical resource but meets the criteria for a unique archaeological resource as defined in Public Resources Code Section 21083.2, then the site shall be treated in accordance with the provisions of Public Resources Code Section 21083.2.				
MM 5.4-4: A qualified paleontologist shall be retained by the Project Developer prior to construction activities to develop and execute a paleontological monitoring plan	A. Develop and execute a paleontological monitoring plan (PMP).	Prior to construction activities.	Applicant/ Construction Manager/	• LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
(PMP) for the grading activities planned for the VTTM site, Off-Site Roadway Improvement Area, and Off-Site Water Tank Area within the Saugus and Pico Formations. The qualified paleontologist shall meet the qualifications established by the Society of Vertebrate Paleontology (SVP). The PMP shall include a construction monitoring schedule to be maintained when earthmoving occurs within Saugus and Pico Formations so that the paleontologist may identify and evaluate fossil resources in the VTTM site, Off Site Roadway Improvement Area, and Off-Site Water Tank Area. The paleontologist shall become familiar with the proposed depths and patterns of grading for grading activities planned in the VTTM site, Off-Site Roadway Improvement Area, and Off-Site Water Tank Area within the Saugus and Pico Formations to provide basis to the development of a monitoring program. The PMP shall be reviewed and approved by the County of Los Angeles Department of Regional Planning prior to the commencement of construction. The qualified paleontologist shall present the elements of the approved PMP to County staff and construction supervisors in a pre-construction meeting. The PMP shall present the fossil sensitivity of the geologic formation, the nature of the resources that have been or may be encountered within the formation and steps to be undertaken to mitigate impacts to these resources to a level of less than significant. A qualified paleontologist shall be retained to monitor grading and excavation activities within paleontologically sensitive areas as determined necessary by the qualified paleontologist and stated in the PMP. Recommended hours for monitoring activities shall be established by the qualified paleontologist and shall be outlined in the monitoring plan. Frequency and location of monitoring	B. Review and approval of PMP by LACDRP. C. Present approved PMP to County staff and construction supervisors. D. Implement approved PMP. E. Maintain log demonstrating compliance.		Qualified Paleontologist	

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
may be increased, decreased, or curtailed as determined by the qualified paleontologist in consultation with the County. If fossils are found during earthmoving activities, the paleontologist shall be authorized to halt the ground-disturbing activities within the prescribed distance in the PMP to allow evaluation of the find and determination of appropriate treatment in accordance with SVP guidelines for identification, evaluation, disclosure, avoidance or recovery, and curation, as appropriate. The paleontologist shall prepare a final report on the monitoring. If fossils are identified, then the report shall contain an appropriate description of the fossils, treatment, and curation. A copy of the report shall be filed with the Project Developer, the County of Los Angeles Department of Regional Planning, and the Natural History Museum of Los Angeles.				
5.5 Energy				
No mitigation measures are required.				
5.6 Geology and Soils				
No mitigation measures are required.				
5.7 Greenhouse Gas Emissions				
No mitigation measures are required.				
5.8 Hazards and Hazardous Materials				
No mitigation measures are required.				
5.9 Hydrology and Water Quality				
No mitigation measures are required.				
5.10 Land Use and Planning				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
No mitigation measures are required.				
5.11 Noise				
MM 5.11-1: Prior to the issuance of grading permits, the Project Developer or their designee shall develop a Construction Noise Reduction Plan to minimize construction noise at nearby noise sensitive receptors. The Construction Noise Reduction Plan shall be developed in coordination with a certified acoustical consultant and the Project construction contractors, and shall be approved by the County of Los Angeles Department of Public Works and the County of Los Angeles Department of Regional Planning. The Construction Noise Reduction Plan shall outline and identify noise complaint measures, best management construction practices, and equipment noise reduction measures. The Construction Noise Reduction Plan shall include, but not be limited to, the following: • Construction equipment shall be properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (i.e., mufflers, silencers, wraps, etc.). • Noise construction activities whose specific location on the Project site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as feasibly possible from the nearest noise-sensitive land uses. • If feasible, grading activities shall be scheduled so as to avoid operating numerous pieces of heavy-duty off-road construction equipment (e.g., backhoes, dozers, excavators, loaders, rollers, etc.) simultaneously in close proximity to the boundary of	A. Develop a Construction Noise Reduction Plan. B. Submit Construction Noise Reduction Plan for review and approval by LACDPW and LACDRP. C. Implement approved Construction Noise Reduction Plan. D. Maintain log demonstrating compliance.	Prior to the issuance of grading permits.	Applicant/ Construction Manager/ Acoustical Consultant	• LACDPW • LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
properties of off-site noise-sensitive receptors surrounding the Project site to reduce construction noise levels by approximately 5 to 10 dB. • Shroud or shield all impact tools, and muffle or shield all intake and exhaust port on power equipment to reduce construction noise by 10 dB or more. • Where feasible, temporary barriers, including but not limited to, sound blankets on existing fences and walls, or freestanding portable sound walls, shall be placed as close to the noise source or as close to the receptor as possible and break the line of sight between the source and receptor where modeled levels exceed applicable standards. Noise barriers may include, but not be limited to, using appropriately thick wooden panel walls (at least 0.5-inches think). Such barriers shall reduce construction noise by 5 to 10 dB at nearby noise-sensitive receptor locations. Alternatively, field-erected noise curtain assemblies could be installed around specific equipment sites or zones of anticipated mobile or stationary activity. The barrier material shall be solid and dense enough to demonstrate acoustical transmission loss that is at least 10 dB or greater than the estimated noise reduction effect. These suggested barrier types do not represent the only ways to achieve the indicated noise reduction in dB; they represent examples of how such noise attenuation might be attained by this measure. • Implement noise complaint reporting. A sign, legible at a distance of 50 feet, shall be posted at the Project construction site, providing a contact name and a				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
telephone number through which residents can inquire about the construction process and register complaints. This sign shall indicate the dates and duration of construction activities. In conjunction with this required posting, a noise disturbance coordinator shall be identified to address construction noise concerns received. The contact name and the telephone number for the noise disturbance coordinator shall be posted on the sign. The coordinator shall be responsible for responding to any local complaints about construction noise and shall notify the County Department of Public Works to determine the cause and implement reasonable measures to the complaint, as deemed acceptable by the County Department of Public Works.				
5.12 Population and Housing				
No mitigation measures are required.				
5.13 Public Services				
MM 5.13.2-1: Prior to the issuance of building permits and approval of the final Project design, lighting, and landscape plans, the Project Developer shall provide to the Sheriff's Department final design plans incorporating the Sheriff's Department design requirements, including Crime Prevention through Environmental Design (CPTED) principles, that could reduce demands for service and ensure adequate public safety shall be incorporated into the building, lighting, and landscape designs. The design requirements for this project shall include: • Security lighting in open areas and parking lots in compliance with the requirements of the County's	Incorporate LASD design requirements.	Prior to the issuance of building permits and approval of the final Project design, lighting, and landscape plans.	Applicant	• LASD • LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
Rural Outdoor Lighting District (Dark Skies) Ordinance; • Street lighting for the Project's streets in compliance with the requirements of the County's Rural Outdoor Lighting District (Dark Skies) Ordinance; • Good visibility of doors and windows from the streets and between buildings on the Project site; • Building address numbers on both residential and commercial uses that are lighted and readily apparent from the streets for emergency response agencies; • Use of low-growing groundcover and shade trees, where feasible, rather than a predominance of high-growing shrubs that could conceal potential criminal activity around buildings and parking areas.				
5.14 Recreation				
No mitigation measures are required.				
5.15 Transportation & Traffic				
PDF 5.15-1: The Project would increase diversity and include a mix of uses.			Applicant	• LACDRP
PDF 5.15-2: The Project's retail and park uses would serve the existing residential communities resulting in an external capture.			Applicant	• LACDRP
PDF 5.15-3: The Project would provide pedestrian connectivity and improvements by linking pedestrians external to the Project site where there are currently gaps in the existing pedestrian network.			Applicant	• LACDRP
PDF 5.15-4: The Project would provide a private trail.			Applicant	• LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
PDF 5.15-5: The Project would dedicate a multiuse trail easement to the County.	Dedicate easement to County.		Applicant	• LACDRP
MM 5.15-1: Prior to the issuance of grading permits, a Construction Traffic Management Plan shall be submitted to the Los Angeles County Department of Public Works (LACDPW) for approval. The Construction Traffic Management Plan shall identify street closure information, a detour plan, haul routes, construction parking, and staging areas. The Construction Traffic Management Plan shall formalize how construction shall be carried out and identify specific actions that shall be required to reduce effects on the surrounding community and shall include the following elements as appropriate: • Hours of construction and hours for deliveries • Identification of haul routes, limits on the length of open trench, work area delineation, traffic control, and flagmen • Access and parking restrictions, pavement markings, and signage requirements (e.g., speed limit, temporary loading zones) • A plan for notification to affected residents and businesses prior to the start of construction. Advance public notification will include posting of notices and appropriate signage of construction activities. The written notification shall include the construction schedule, the exact location and duration of activities within each street (i.e., which lanes and access point/driveways would be blocked on which days and for how long), and a toll-free telephone number for receiving questions or complaints	A. Submit Construction Traffic Management Plan for review and approval by LACDPW. B. Implement approved Construction Traffic Management Plan.	Prior to the issuance of grading permits.	Applicant/ Construction Manager	• LACDPW • LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
• Coordination with emergency service providers in the area at least one month in advance. Emergency service providers shall be notified of the timing, location, and duration of construction activities. All roads shall remain passable to emergency service vehicles at all times • Require all open trenches to be covered with metal plates at the end of each workday to accommodate traffic and access • Restore all streets pursuant to agreements with the local jurisdictions				
MM 5.15-2: Prior to final map recordation, the Project Developer shall provide to the LACDPW the location and function of a community wireless internet (Wi-Fi) connection for review and approval, such as at the commercial retail and park sites, to promote telecommuting (tele-work). Additionally, the Project Applicant shall provide a Covenant and Agreement to LACDPW for maintaining the community Wi-Fi connection prior to final map recordation. Purchasers of homes shall be informed of the location and relevant information to access the community Wi-Fi connection prior to the close of escrow. Prior to the issuance of an occupancy permit for the 116th residential unit, the 3.4-acre neighborhood park shall be rough graded and constructed. The community Wi-Fi shall be installed at the 3.4-acre neighborhood park upon completion of construction. Prior to the issuance of an occupancy permit for the 194th residential unit, the commercial retail center shall be graded. The community Wi-Fi shall be installed at the commercial retail center upon completion of	A. Provide location and function of a community wireless internet (Wi-Fi) to LACDPW for review and approval. B. Provide a Covenant and Agreement to LACDPW for maintaining the community Wi-Fi connection.	Prior to final map recordation.	Applicant	• LACDPW • LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
construction.				
MM 5.15-3: Prior to the issuance of building permits and final Project design, the Project Developer shall incorporate the location of traffic calming measures, such as marked crosswalks at appropriate locations, for on-site streets and intersections. Specific measures shall comply with the Castaic Area Community Standards District (CSD) and shall be approved by LACDPW.	A. Incorporate the location of traffic calming measures. B. Submit for review and approval by LACDPW.	Prior to the issuance of building permits and final Project design.	Applicant	• LACDPW • LACDRP
MM 5.15-4: Prior to the issuance of grading permits, the Project Developer shall submit the Project's final design drawings, including the location of the future planned Class III bicycle facility on Del Valle Road as identified on Figure A-3: Los Angeles County Existing and Proposed Regional Trail Network, of the County of Los Angeles Trails Manual, to the County of Los Angeles Department of Regional Planning for approval.	Submit final design drawings to LACDRP for review and approval.	Prior to the issuance of grading permits.	Applicant	• LACDRP
MM 5.15-5: Prior to the issuance of building permits, the Project Developer shall submit a final plan that indicates the location of neighborhood electric vehicles (NEV) amenities, such as NEV parking, charging stations, signage, and educational materials, at community locations (i.e., the commercial lot and parks) to LACDPW for approval. All NEV amenities shall comply with LADPW requirements.	Submit a final plan that indicates the location of neighborhood electric vehicles (NEV) amenities to LACDPW.	Prior to the issuance of building permits.	Applicant	• LACDPW • LADPW • LACDRP
MM 5.15-6: Prior to the issuance of grading permits, the Project Developer shall consult with the Santa Clarita Transit (SCT) regarding the relocation of the existing bus stop on Del Valle Road to the proposed Sterling Ranch Parkway at a location in direct proximity to the proposed commercial retail and park uses. The new bus stop location shall be approved by LACDPW and shall be constructed by the Project Developer. The new bus stop	A. Consult with Santa Clarita Transit (SCT) for bus stop relocation. B. Approval by LACDPW for new bus stop location.	Prior to the issuance of grading permits.	Applicant	• LACDPW • SCT • LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
shall be constructed with amenities to facilitate transit use such as shade structures, benches, and bike racks in accordance with SCT requirements.				
MM 5.15-7: Intersection No. 4: Del Valle Road & Hasley Canyon Road (Project Traffic Share Percentage: 18.6 %) • Install traffic signal • Intersection modification to provide one northbound left-turn lane, one northbound free-flow right-turn lane, and one westbound left-turn lane	Install intersection modification in accordance with approved plans.			• LACDRP
MM 5.15-8: Intersection No. 5: Commerce Center & Hasley Canyon Road (Project Traffic Share Percentage: 10.3%) • Intersection modification to restripe the eastbound shared left and through lane to a shared left, through and right lane (for 1 EB Left, 1 shared EB Left/Through/Right and 1 EB Right)	Install intersection modification in accordance with approved plans.			• LACDRP
MM 5.15-9: Intersection No. 1: Chiquito Canyon Road & SR-126 (Project Traffic Share Percentage: 1.2 %) • Intersection modification to provide two southbound left turn lanes, three southbound through lanes, one southbound right-turn lane (for 2 SB Left, 3 SB Through and 1 SB Right), two westbound left-turn lanes, three westbound through lanes, one westbound right-turn lane (for 2 WB Left, 3 WB Through and 1 WB Right), two northbound left-turn lanes, two northbound through lanes, two northbound right turn lanes (for 2 NB Left, 2 NB Through and 2 NB Right), two eastbound left-turn lanes, three eastbound through lanes, one eastbound right-turn lane (for 2 EB Left, 3	Install intersection modification in accordance with approved plans.			• Caltrans • LACDRP

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
EB Through and 1 EB Right). Install traffic signal. [Improvements are identified in Caltrans SR-126 PSR.] • Receive additional Project traffic fair-share percentage (0.9%) intended for Wolcott Way & SR 126 impact mitigation.				
MM 5.15-10: Intersection No. 6: The Old Road & I-5 SB Ramps (at Sedona Way) (Project Traffic Share Percentage: 0.6 %) • Intersection modification to provide signage on The Old Road that directs freeway on-ramp traffic to the Hasley Canyon on-ramp as an alternate freeway access point. Signage to be maintained by County and installed within the County right-of-way.	Install intersection modification in accordance with approved plans.			• Caltrans • LACDRP
MM 5.15-11: Intersection No. 14: Wolcott Way & SR-126 (Project Traffic Share Percentage: 0.9 % - to be applied to Chiquito Canyon Road Improvements) • In lieu of improvements to this location, transfer Project's traffic fair-share percentage towards mitigating Chiquito Canyon Road & SR 126 impacts.	Transfer Project's traffic fair-share percentage.			• Caltrans • LACDRP
5.16 Tribal Cultural Resources				
MM 5.16-1: Prior to the commencement of grading, the Project Developer shall enter into an agreement with the Fernandeno Tataviam Band of Mission Indians to allow representatives of the Fernandeno Tataviam Band of Mission Indians to monitor the grading of native, undisturbed soils for tribal cultural resources on the Project site.	Enter agreement for Tribal Monitor.	Prior to the commencement of grading.	Applicant	• LACDRP
5.17 Utilities & Service Systems				
No mitigation measures are required.				

Project Design Feature/Mitigation Measure	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
5.18 Wildfire				
No mitigation measures are required.				

APPENDIX A

RILEY, S.P.D., SIKICH, J.A. and BENSON, J.F. (2021), *Big Cats in the Big City: Spatial Ecology of Mountain Lions in Greater Los Angeles*. Jour. Wild. Mgmt., 85: 1527-1542. https://doi.org/10.1002/jwmg.22127

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Featured Article

Big Cats in the Big City: Spatial Ecology of Mountain Lions in Greater Los Angeles

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ABSTRACT Large carnivores can represent the ultimate challenge for conservation in developed landscapes because of their large area requirements and potential for conflict with humans. Some large carnivores such as mountain lions (*Puma concolor*) can use a wide range of biomes and vegetation types, and in southern California, USA, they persist in metropolitan Los Angeles, a megacity of 18 million people. Understanding how large carnivores use highly altered landscapes is important for their conservation and management. We estimated home range size, landscape use, and landscape selection for mountain lions in the Santa Monica Mountains and surrounding areas for 29 subadult and adult animals from 2002 to 2016, using 128,133 locations from global positioning system (GPS)-collars. Home range size was similar to that reported by other researchers; home ranges averaged 372 km^2 for adult males and 134 km^2 for adult females, except for 2 adult males in isolated habitat fragments that maintained 2 of the smallest adult male home ranges ever recorded (24 km^2 and 54 km^2). Mountain lions very rarely entered developed areas, consistently avoided altered open areas such as golf courses, cemeteries, or other landscaped spaces, and showed a positive relationship between home range size and amount of development, all indicating that developed areas have reduced value for mountain lions. Mountain lions from all sex and age classes selected areas closer to development than expected by chance, which could be related to the presence of mule deer (*Odocoileus hemionus*) or other prey in or adjacent to urbanization. For 2 adult males that occupied home ranges within the most urban portions of our study area, their response to urban development differed strongly across diurnal periods, ranging from avoidance during the day to selection at night. Shrub vegetation types, especially chaparral, were important in terms of habitat use and resource selection, highlighting their importance for conservation of the species in southern California. North America's largest felid can thrive in shrublands and persist even in one of the world's largest cities, although they only very rarely venture into developed areas within that city.

KEY WORDS chaparral, habitat use, large carnivore, megacity, mountain lion, resource selection, urbanization.

Understanding how animals use and select resources is fundamental to ecology and conservation biology. Landscapes, however, are becoming increasingly modified by human activities (Newbold et al. 2015), which presents challenges and opportunities for wildlife species occupying anthropogenic landscapes, including cities (McKinney 2002, Gehrt et al. 2010, Guetté et al. 2017). More than half of the world's population now lives in cities, and as the human population grows, the number and areal expanse of cities continues to grow (Grimm et al. 2008, Seto et al. 2012). Urbanization removes natural areas entirely, fragments remaining natural areas into smaller patches, and results in a myriad of edge effects such that the city and its human population can severely affect the urban-wildland border and adjacent natural areas (McKinney 2002, Mcdonald et al. 2009). Perhaps most important are the conservation questions of how habitat loss, fragmentation, and alteration affect wildlife populations and communities (McKinney 2008, Gagné and Fahrig 2010, Delaney et al. 2021), and specifically which species survive in urban landscapes and can be expected to over the long-term (i.e., for which species are urban landscapes not sinks).

Mammalian carnivores are of particular interest to ecologists and managers in urban landscapes because they are likely to be strongly affected by habitat loss and fragmentation (Sunquist and Sunquist 2001) and are often unable to maintain viable populations in cities because of their

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extensive area requirements (Beier 1993, Cypher et al. 2010, Benson et al. 2016*a*). The potential for real or perceived conflict with domestic animals such as pets or livestock, or even with humans, can also make urban carnivores an important and challenging management concern (Curtis and Hadidian 2010). Both of these issues are even more pronounced for large carnivores such as wolves (*Canis lupus*), bears (*Ursus* spp.), or large cats, which have greater energetic requirements and roam over far greater areas even than medium-sized carnivores such as coyotes (*Canis latrans*), raccoons (*Procyon lotor*), or bobcats (*Lynx rufus*), and pose a greater risk of conflict. Large felids are obligate carnivores and do not take advantage of anthropogenic resources (e.g., trash or ornamental fruit), in contrast to coyotes (Larson et al. 2020) and black bears (*Ursus americanus*; Baruch-Mordo et al. 2014); therefore, large felids face perhaps some of the greatest challenges for wildlife in metropolitan areas because they require sufficient densities of large herbivore prey. Consequently, there are few populations of large carnivores, and even fewer of large felids, in cities (Bhatia et al. 2013, Riley et al. 2014).

As of 2009, there were essentially only 2 studies that had investigated the ecology of large felids in urban areas, both of mountain lions (*Puma concolor*) in southern California, USA (Beier et al. 2010). More recently, the response of mountain lions to development of varying intensities, up to and including urban development, has been studied in a number of places across the West including the Front Range of the Rocky Mountains in Colorado (Moss et al. 2016, Blecha et al. 2018, Alldredge et al. 2019), in Washington west of Seattle (Kertson et al. 2011, 2013, Robins et al. 2019), around 3 cities in Arizona, including Tucson (Nicholson et al. 2014), in the Santa Cruz Mountains of central California (Wilmers et al. 2013, Smith et al. 2015, Wang et al. 2017), and in Orange and San Diego counties south of Los Angeles (Burdett et al. 2010, Jennings et al. 2016, Zeller et al. 2017) building on the seminal work of Beier (1993, 1995). These studies have reported on the ecology and behavior of mountain lions relative to humans and residential development. In these studies, the intensity of development that the mountain lion population was exposed to was generally suburban or exurban, significantly less dense than that typically associated with urbanization.

We know of just 1 other megacity in the world where there is a population of large felids: Mumbai, India where there are resident leopards (*Panthera pardus*; Braczkowski et al. 2018). The fact that there are still mountain lions in Los Angeles supports the importance of significant natural open space in and around the city, in the San Gabriel Mountains and Santa Susana Mountains to the north and in the Santa Monica Mountains to the west. The long-term persistence of the species in Los Angeles, however, is far from certain. In the Santa Monica Mountains population, movement of mountain lions is significantly restricted by major freeways and development. This restriction has led to very low genetic diversity and potentially increased incidence of social interactions such as intraspecific killing and inbreeding between close relatives (Riley et al. 2014). Benson et al. (2016*a*, 2019) modeled the viability of the population using demographic and genetic information and estimated that there was a 20% probability of extirpation over the next 50 years due purely to demographic processes. If inbreeding depression increases mortality as in another isolated, inbred population of mountain lions (Florida panthers [*P. c. coryi*]; Johnson et al. 2010), the modeling of Benson et al. (2016*a*, 2019) predicted that rapid extinction of the Santa Monica Mountains population would be almost certain in the following 50 years. Individuals in this population face significant mortality risk from humans from vehicle collisions and exposure to anticoagulant rodenticides (Riley et al. 2007, Benson et al. 2020). Thus, a better understanding of their space use and resource selection within this human-dominated landscape is essential for management of this population and of the species more broadly. For example, California is currently considering listing mountain lions in coastal California, including in this population, as threatened under the state Endangered Species Act, and improved understanding of mountain lion spatial ecology in relevant areas would benefit both the listing evaluation and subsequent protection actions.

Mountain lions persisting in one of the largest metropolitan areas in the world present a rare opportunity to increase our understanding of how large carnivores navigate heterogeneous and fragmented urban landscapes. We studied the behavior of mountain lions in and around the City of Los Angeles, a metropolitan area of >18.5 million people (U.S. Census Bureau 2015), the second largest in the United States, and 1 of just 3 megacities (>10 million inhabitants) in North America. Our work provides a detailed evaluation of the spatial ecology of mountain lions from the most urban landscape in North America occupied by mountain lions, thus providing valuable information to managers of mountain lions and potentially other top predators in and around urban centers.

Overall, we hypothesized that development and other anthropogenic modification of natural landscape features decrease the value of these areas for mountain lions in human-affected ecosystems. We addressed this general hypothesis by testing a number of specific predictions about space and habitat use relative to human disturbance. First, we investigated the relationship between home range size and the degree of development, predicting that the size of home ranges would increase with the proportion of development within them, except in extreme cases where home ranges were constrained to small fragments of natural areas surrounded by freeways and urbanization. Second, we evaluated how mountain lions used the landscape, both in terms of natural vegetation types and in terms of human land use, including intensely developed areas such as residential, commercial, or industrial areas, and altered open areas such as golf courses, cemeteries, or other managed areas of vegetation. Based on previous results with other local carnivores such as bobcats (Riley et al. 2003), we predicted that mountain lions would rarely be in developed areas but would potentially more often be in altered open areas. Third, in a resource selection context, we evaluated whether mountain

lions selected or avoided these modified areas. Similar to our predictions for habitat use, we predicted that mountain lions would avoid developed areas and perhaps somewhat less so altered open areas, and on an individual level, that mountain lions in the most urban areas would respond most strongly during the day, when people are more active. We also evaluated the use and selection of natural vegetation types, and predicted that mountain lions would most strongly select riparian and oak (*Quercus* spp.) woodlands, based on previous studies in the region. Finally, we determined mountain lion selection of recently burned areas, predicting that they would select them in the first few years after fire.

STUDY AREA

We conducted research in and adjacent to the city of Los Angeles in Los Angeles and Ventura counties, California (Fig. 1) from 2002 through 2016. The study was focused on Santa Monica Mountains National Recreation Area, a unit of the National Park System, and surrounding areas. The park boundary encompassed approximately 600 km^2 and included an assemblage of federal, state, and privately owned lands largely in the Santa Monica Mountains. The Santa Monica Mountains were bordered by the Pacific Ocean to the south; by United States Highway 101, an 8–10 lane freeway, and various urban and suburban communities to the north; by the highly urbanized Los Angeles basin to the east; and by agricultural and developed areas in Ventura County to the west. Additionally, we studied mountain lions in areas north and east of the Santa Monica Mountains in the Simi Hills, the Santa Susana Mountains, Griffith Park, and the Verdugo Mountains (Fig. 1). Griffith Park was a municipal park lying within the City of Los Angeles in the eastern portion of the Santa Monica Mountain Range and was completely surrounded by freeways (134, 5, and 101) and intense development in Burbank, Glendale, and Hollywood (Fig. 1). The Verdugo Mountains were a small, rugged mountain range spanning several cities, including Los Angeles, which were surrounded by intense development in Burbank and Glendale to the south and east and by the 210 Freeway to the north (Fig. 1). All patches of natural land cover in the study area were bordered by major freeways, urbanization, or agricultural development. The study area was characterized by a Mediterranean climate, with cool, wet winters (Nov–Apr) and hot, dry summers (May–Oct). There were multiple land uses throughout the area including federal, state, and local parklands, urban and suburban areas with commercial and residential (both high and low density) development, and agricultural areas. Elevation ranged from sea level (0 m) to 948 m, and the topography ranged from steep, rugged canyons to rolling hills and valleys. Natural vegetation consisted of mixed chaparral, coastal sage scrub, oak

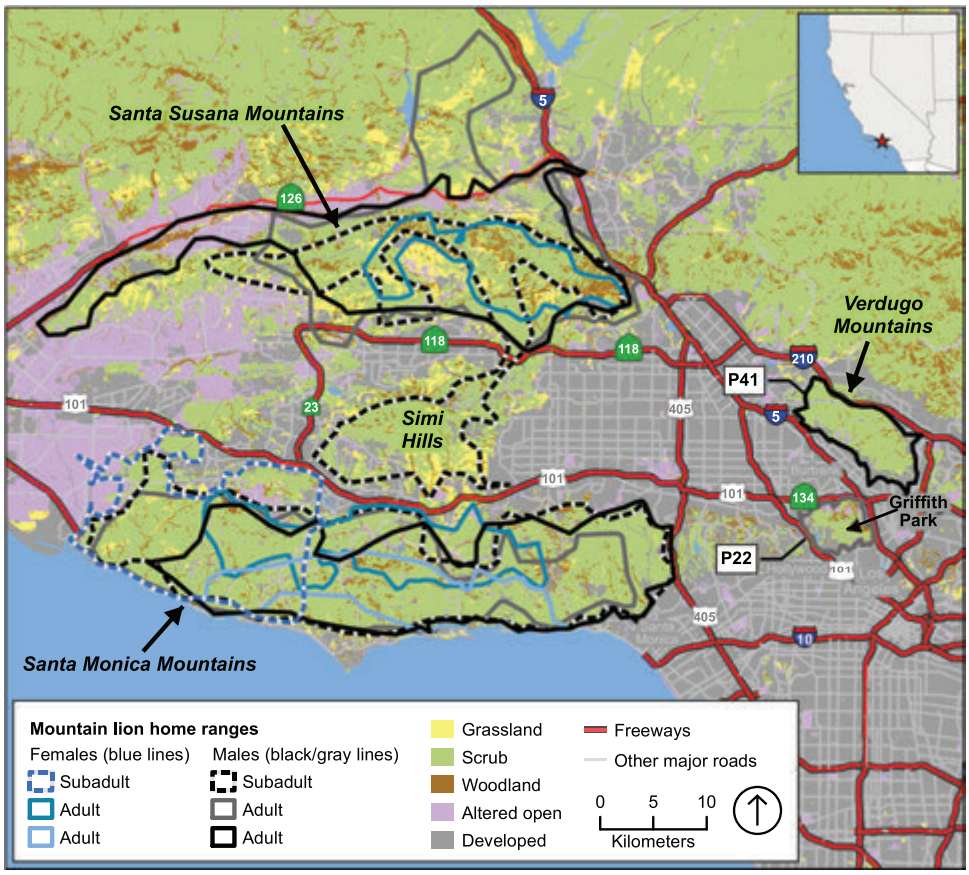

Figure 1. Study area and selected home ranges for global positioning system collared mountain lions in the Los Angeles area, California, USA, 2002–2016. The background is from the land-cover map used in habitat use and selection analyses. Altered open areas were those modified by humans, often with landscaped vegetation (e.g., golf courses, cemeteries). Adult males P22 and P41 had extremely small home ranges isolated by freeways and urban development.

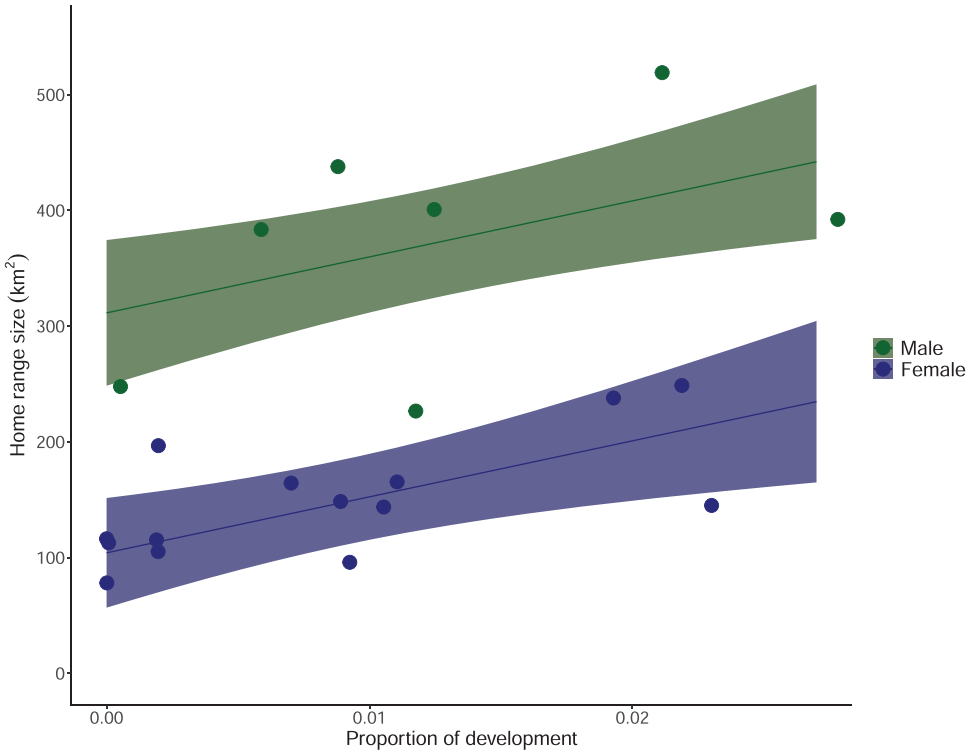

Figure 2. Positive, linear relationship between home range size and proportion of development within home ranges of resident mountain lions in the Los Angeles area, California, USA, 2002–2016 as estimated with a generalized additive mixed model. We show the raw datapoints along with the predicted trends and the 95% confidence intervals (shaded area).

woodlands and savannas, riparian woodlands, and non-native annual grasslands. Bobcats and coyotes occurred throughout most of the study area. The only wild ungulates were mule deer (*Odocoileus hemionus*), the main prey for mountain lions (Benson et al. 2016*b*).

METHODS

Capture and Telemetry

We captured mountain lions using foot cable-restraints (i.e., Aldrich foot snares), baited cage-traps, or by treeing them with trained hounds during 2002–2016. We immobilized mountain lions with ketamine hydrochloride combined with either xylazine hydrochloride or medetomidine hydrochloride administered intramuscularly. We monitored captured animals for the duration of the time they were immobilized and estimated age based on body size and tooth wear measurements (Anderson and Lindzey 2000, Laundré et al. 2000). We deployed global positioning system (GPS)-collars (Followit AB, Simplex and Tellus models, Stockholm, Sweden; North Star Science and Technology, Globalstar Tracker model, King George, VA, USA; or Vectronic Aerospace, GPS Plus model, Berlin, Germany) equipped with very high frequency beacons on adults and subadults (independent animals prior to reproduction: females 14–25 months, males 14–42 months). Fix schedules of GPS-collars varied, but we programmed most collars to obtain 1–2 day locations and 5–7 night locations every 24 hours. Capture and handling procedures were permitted through a scientific collecting permit with the California Department of Fish and Wildlife (number 5636) and the National Park Service Institutional Animal Care and Use Committee, and our use of animals was consistent with the American Society of Mammalogists guidelines (Sikes et al. 2011).

We attempted to catch every individual that we were aware of and continued to track previously collared animals by recapturing them. We used remote motion-sensitive cameras throughout the study area to document uncollared animals. In the Santa Monica Mountains, we generally followed about 75% of the adults and subadults, especially later in the study period. In the Simi Hills, 3 animals moved through or used them periodically, but there was no evidence of resident animals there during this study. We tracked a smaller proportion of animals in the Santa Susana Mountains. Adult male P22 was the only mountain lion that was documented using Griffith Park. In the Verdugo Mountains, there was an uncollared adult female, along with adult male P41.

Home Range Analyses

We estimated adaptive local convex hull home ranges in R version 2.15.1 (R Core Team 2020) with the package adehabitat (Calenge 2006) using GPS telemetry data for each mountain lion included in our analysis to calculate the 100% isopleth. We set the *a* parameter as the maximum distance between any 2 points in each dataset (Getz et al. 2007). We filled in internal holes for home range polygons because we used them to estimate availability in our resource selection analyses. Thus, our goal was to define the outer

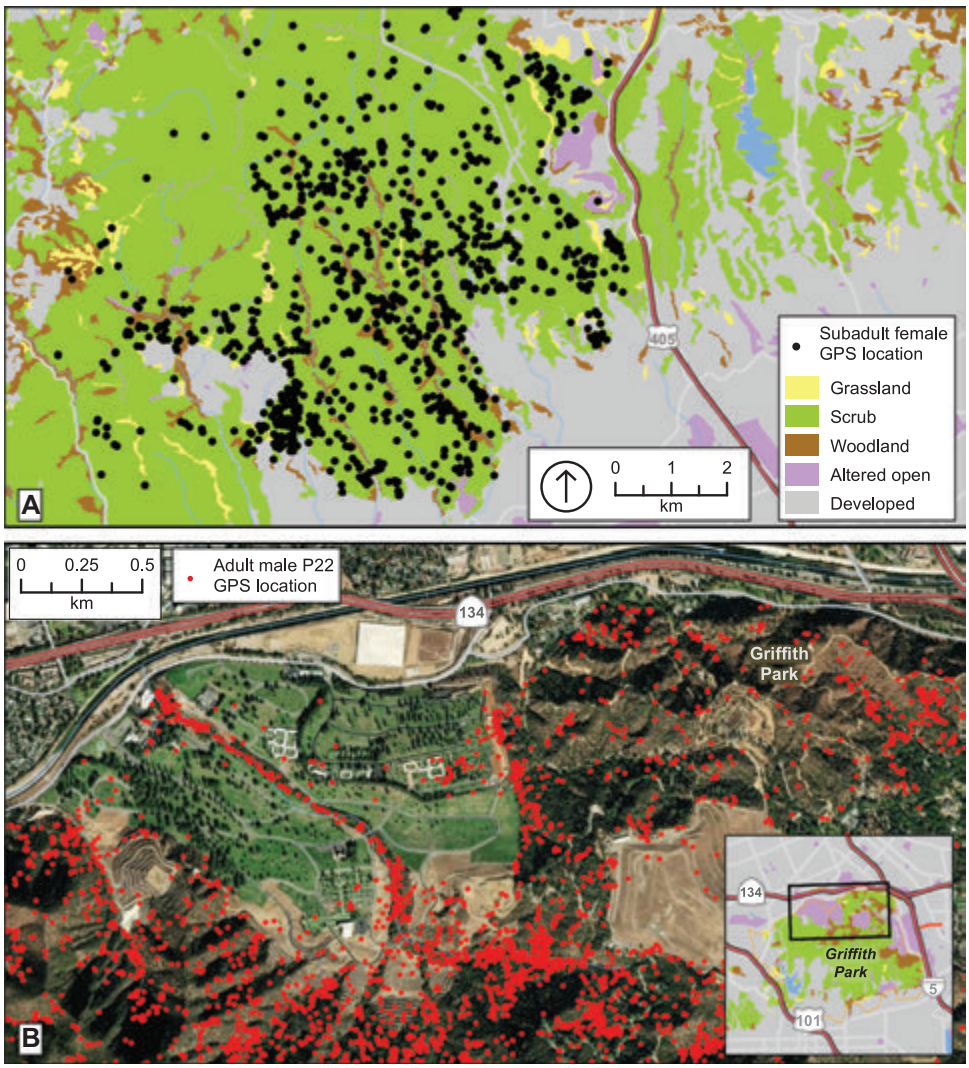

Figure 3. A) Locations from the global positioning system (GPS)-collar for a subadult female mountain lion in the eastern Santa Monica Mountains, California, USA, 2015–2016. The background is from the land-cover map used in habitat use and selection analyses. Altered open areas were those modified by humans, often with landscaped vegetation (e.g., golf courses, cemeteries). Although this female was often close to development, just 1 location of 2,067 (0.05%) used in our analysis was within it. B) The GPS-collar locations for adult male P22, in the Griffith Park Area, California, USA, 2012–2106. The inset shows the land-cover map for his whole home range. Male P22 was rarely located in altered open areas and resource selection analyses indicated significant avoidance of these areas.

boundaries of areas that were used by each mountain lion, and we assumed that the areas within these polygons were within their home ranges and available to that individual. We estimated home range separately for adults ($n = 16$; 7 females, 9 males) and subadults ($n = 17$; 8 females, 9 males). Overall, we estimated 33 home ranges for 29 mountain lions (4 were tracked as both adults and subadults) using all data collected from the period we monitored each animal (min. = 94 days) in the relevant age class.

We investigated the influence of intrinsic (sex, age class) and environmental (proportion of development) factors on home range size using generalized additive mixed models (GAMMs). In these models, the response variable was home range size, and we included a parametric, dummy-coded predictor variable for male (reference female). We also included a non-parametric predictor for the proportion of development that we fit as a smooth function (spline) to capture potential non-linear relationships. We included a random intercept of individual to account for the lack of independence of data from animals tracked as both adults and subadults. First, we conducted our main analysis with non-dispersing residents only but excluded the 2 animals tracked in highly urban environments, specifically relatively small patches of natural area surrounded by dense residential and commercial development (P22, P41; Fig. 1) and dispersing animals (all subadult males and 1 subadult female). Next, we conducted a second analysis with home range estimates for all animals. This second analysis allowed us consider the influence of development on space use more broadly and to consider the influence of higher levels of development experienced by the 2 males occupying the small, isolated habitat patches. In this second model, we also included a dummy-coded variable for adult (reference subadult) and an interaction between

male and subadult because we included subadults and adults of both sexes.

Landscape Use

We evaluated use of the landscape by classifying GPS telemetry locations of mountain lions by natural land-cover type and anthropogenic land-use type, and calculating the proportion of home ranges classified as each natural land-cover type and anthropogenic land-use type. We modified 2 existing vegetation layers (Classification and Assessment with Landsat of Visible Ecological Groupings-CALVEG 2013, National Park Service 2014) by combining similar land-cover types to produce a layer with 7 broad land-cover classes: chaparral, coastal sage scrub, grassland, upland woodland, riparian woodland, other, and water. The other category included the remaining rare land-cover classes, mainly exotic vegetation but also areas classified as rock, sand, or other features. For areas where land cover was developed or otherwise altered for anthropogenic activities, we generalized a digital land-use map (Southern California Association of Governments 2005) for 2 classes of anthropogenic land use: development and altered open. Development included commercial and industrial areas and residential areas with ≥2.5 houses/ha. Altered open were areas modified by humans to a lesser extent than developed areas and included golf courses, schools, landscaped areas such as city parks, low-density residential areas (<2.5 houses/ha), cemeteries, horse ranches, and agricultural areas. The Southern California Association of Governments map (2005) was the most accurate available land-use data for the region, and it was reflective of the landscape throughout the study period from 2002–2016 for the development and altered open classifications that we used in these analyses. The geographic information system (GIS) program monitors land use in and around the park as part of the National Park Service Inventory and Monitoring Program.

Resource Selection

We estimated resource selection within home ranges (third-order selection; Johnson 1980) for mountain lions. To estimate resource availability, we systematically sampled 30-m pixels separated by 150 m throughout each home range, resulting in 44 pixels/km^2 (Benson 2013). We then calculated distances from the centroid of all 30-m pixels used by (telemetry) and available to (systematic locations) mountain lions to the closest patch of each land-cover or land-use type (Table S1, available online in Supporting Information). We did not include the water and other variables in resource selection analyses. The water areas were very rare and not likely used, and the other category included a number of land-cover classes that were rare in most home ranges and selection of which would not have clear biological meaning. We calculated these distances using the Euclidean distance tool in the Spatial Analyst toolbox in ArcGIS 10.2.2 (Esri, Redlands, CA) using GIS methods described by Benson (2013). We also estimated distances from unpaved roads and trails (i.e., trails = fire roads, other unpaved roads, and hiking trails). Although we initially intended to consider 3 classes of paved roads, primary roads (major highways) were rare within home ranges, whereas secondary and tertiary roads (intermediate and smaller paved roads) were highly correlated with our anthropogenic land-use classes, specifically development, so we excluded paved roads from the analysis. We estimated slope and elevation from digital elevation models in ArcGIS and classified all used and available pixels with respect to these topographic variables (Table S1). Digital elevation model data were estimated at 9.5-m resolution, but we averaged these data across 30-m used and available pixels for our analyses.

Distance-based variables are effective for assessing habitat selection (Conner et al. 2003), and using continuous, distance-based variables for natural land-cover types and land-use classes (rather than categorical variables) also eliminated the need to base inference on subjectively chosen reference categories in our regression models (Beyer et al. 2010). Distance-based approaches for habitat selection analysis are also robust to error in location data (Conner et al. 2003) and can mitigate GIS error. Finally, distance-based analyses are especially effective for evaluating selection for areas that animals may be attracted to but rarely actually enter (e.g., water or developed areas; Benson et al. 2015, 2016*b*).

We modeled resource selection with generalized linear mixed models implemented in the R version 3.1.1 (R Core Team 2020) package lme4 (Bates et al. 2015) with a binary (0 = available, 1 = used) response variable. We included random intercepts for individual in each model to mitigate effects of unbalanced telemetry data across individuals (range = 796–10,407 locations, $\bar{x}$ = 3,883) and the lack of independence between used locations from the same individual, and to pair used and available data for individuals within our models. After excluding paved roads, correlation between predictor variables was modest or low ($r < 0.50$) so we included all remaining variables in our global model (Table S1). Prior to modeling, we rescaled values for all continuous variables by subtracting their mean and dividing by 2 standard deviations (Gelman 2008).

The use-available design for resource selection models estimates the relative probability of use of resource variables (i.e., relative to their availability). We use the terms selection and avoidance throughout to indicate that used locations were significantly closer to (selection) or farther from (avoidance) distance-based resource variables (vegetation types, land-use types, trails) than were available locations, or values of classification-based resource variables (elevation and slope) were significantly greater or lower at used locations relative to available locations. Specifically, we inferred selection or avoidance of resource variables when 95% confidence intervals of fixed-effect beta coefficients did not overlap zero.

We investigated potential sex- and age-specific patterns in resource selection. Initially we created models with 3-way interactions between dummy-coded variables of male (female = 0, male = 1) and adult (subadult = 0, adult = 1), and each resource variable. These exploratory analyses indicated there were strong differences in resource selection among age and sex classes, but interpretation of these interactions was cumbersome. Thus, we created male- and

female-specific models and included 2-way interactions between adult and each resource variable, which again showed differences between age-classes within both sexes. We next created separate models for each of the 4 sex and age-class combinations (adult females, subadult females, adult males, subadult females) to provide simpler interpretation without interactions. We also created exploratory models separated by time of day (day, crepuscular, and night, with crepuscular defined as an hour before and after sunset and sunrise). At the population-level, selection patterns were generally similar across the different time periods. Thus, for simplicity we pooled data across time periods for our population-level analysis. We investigated individual-level variation in selection of human-altered areas (development and altered open) relative to time of day and degree of urbanization within each home range.

Because resource selection models with large numbers of GPS telemetry locations have considerable power to detect statistical significance, we evaluated biological significance by examining the relative effect sizes (beta coefficients) from these models. Thus, strongest selection and avoidance patterns by mountain lions can be inferred from resource variables that separated from zero most strongly. We present beta coefficients and confidence intervals to allow readers to evaluate statistical and biological significance.

We tested the predictive ability of our models using k-fold cross validation implemented in lme4 as described by Boyce et al. (2002). Specifically, we used 80% of the data (training data) to build a model that we then used to predict the relative probability of use of the remaining 20% (test data). We repeated this procedure 5 times until all data had been used as both training and test data. We ran Spearman rank correlations to assess relationships between the frequency of cross-validated locations and 10 probability bins of equal size representing the range of predicted values. A model with good predictive ability is expected to show a strong correlation with higher numbers of locations falling into higher probability bins (Boyce et al. 2002).

Individual-Level Modeling

We also explored additional individual variation in selection of areas modified by humans. First, we hypothesized that the distance of mountain lions to development or altered open areas might vary as a function of the availability of these areas, consistent with a functional response in resource selection (Mysterud and Ims 1998). We estimated individual-level responses of mountain lions to anthropogenic land use by including a random slope term for development and altered open in resource selection models with all resource variables described above also included as predictors (Gillies et al. 2006). We ran separate models for day, night, and crepuscular periods to derive individual-level coefficients that were specific to these periods across the 24-hour period. We then explored potential functional responses to development and altered open using generalized additive models (GAMs) with the time-period-specific individual-level coefficients as response variables. We specified predictor variables ($\bar{x}$ distance to development or altered open across each individual's home range) as nonparametric smooth functions (splines) in the GAMs to allow for the possibility of non-linear relationships. Second, we hypothesized that individual mountain lions might change their behavior relative to development and altered open between time periods (day, night, crepuscular) as a function of increasing human presence. We subtracted the day—night, day—crepuscular, and crepuscular—night coefficients to derive values reflecting the change in selection between each time period following Benson et al. (2015). We included these values as the response variable in GAMs with a predictor variable for distance-based availability of development or altered open to investigate whether animals changed their behavior across the 24-hour period as a function of increasing urbanization.

Response to Fire

Fire is part of the natural disturbance regime in our study system. Previous researchers of mountain lions occupying shrub-dominated mountains south of Los Angeles reported that mountain lions responded opportunistically to burned areas and that there was considerable individual variability in the response, and they suggested that mountain lions may benefit in the short-term from fire disturbance (Jennings et al. 2016). In our study, only 9 mountain lions that we tracked interacted with 4 separate fires that burned significant portions (≥5%) of their home ranges. Therefore, we conducted a subset analysis with these 9 mountain lions. For these fires, we used polygons that documented the extent of each fire and reclassified these areas as burned in our land-cover and land-use layers and recalculated availability for each of the 9 mountain lions. To examine relatively short-term responses to fires, we used all telemetry data for these mountain lions for up to 3 years following the fire as the used data. We ran a new resource selection model and evaluated selection and avoidance of all resource variables and the additional burned variable. We also included a random slope term for burned to evaluate individual-level variation in response to fire. Although we realize our analysis is a simplification of the complex response of mountain lions to fire disturbance, we wanted to investigate this relationship using the relatively small subset of relevant data available.

RESULTS

Home Ranges

Home range size.—From July 2002 through December 2016, we captured and GPS-collared 29 adult and subadult mountains lions, obtained 128,133 locations for analysis, and estimated 33 home ranges. Of the 29 animals tracked, 19 were in the Santa Monica Mountains, 7 in the Santa Susana Mountains, 1 in Griffith Park, 1 in the Verdugo Mountains, and 1 was a disperser between areas. Mean home range size was $372 \pm 103\,km^2$ (SD) for 7 adult males (we excluded home ranges for 2 males using highly urban environments), $134 \pm 22\,km^2$ for 7 adult females, $284 \pm 134\,km^2$ for 9 subadult males, and $162 \pm 68\,km^2$ for 7 subadult females (excluding 1 female who was dispersing

throughout the monitoring period). Male home ranges were larger than those of females, particularly for adults. Two adult males (P22, P41) lived in isolated natural areas surrounded by dense residential and commercial development and freeways and had much smaller home ranges than any other animals, and in particular than any other adult males. Specifically, P22 inhabited a home range of 24 km^2 for 4.5 years in the Griffith Park Area, and P41's home range was 54 km^2 in the Verdugo Mountains (Fig. 1). There was considerable variability in home range size, especially for subadult males. For example, 3 subadult males had home ranges >400 km^2, larger than those of most adult males. In the Santa Monica Mountains, there were 5 males (2 adults, 3 subadults) that had home ranges encompassing essentially the entire isolated mountain range south of the 101 Freeway and west of the 405 Freeway (Fig. 1, 3 of these males portrayed). By contrast, home range size was relatively consistent across adult females (range = 105–165 km^2).

For the 4 animals for which we estimated both subadult and adult home ranges, the size of their home ranges did not change considerably, perhaps not surprisingly because 3 of these 4 animals were females, and subadult female ranges were on average just 28 km^2 larger than those of adults. Specifically, one female's range went from 164 km^2 (subadult) to 165 km^2 (adult), her daughter's declined from 197 km^2 to 116 km^2, and her granddaughter 's increased from 115 km^2 to 144 km^2. Only a single radio-collared male successfully transitioned to adulthood during this study; he dispersed north from the Santa Susana Mountains (Riley et al. 2014) and went from using 191 km^2 to 248 km^2.

Factors influencing home range size.—For our main analysis, excluding dispersing subadults (all subadult males and 1 subadult female) and the 2 males using small isolated fragments, the relationship between home range size and proportion of development within the home range was positive, in accordance with our prediction, and linear ($\beta = 4{,}839.0$, $t = 2.9$, $P = 0.010$; Fig. 2) and males had larger home ranges than females ($\beta = 207.3$, $t = 6.6$, $P < 0.001$; adjusted $R^2 = 0.77$). We conducted a second analysis with all animals, which resulted in a non-linear relationship that captured the positive relationship between home range size and development from low to moderate development (0–7% of home ranges; Fig. S1A, available online in Supporting Information) but transitioned to a strongly negative relationship at higher levels of development influenced by the 2 adult males occupying highly urban environments (16–18% development; Fig. S1B).

Landscape Use

Mountain lion use relative to human land use.—Overall, mountain lion use of urban areas was very low (Table 1), as we predicted. For all animals, including the 2 males in the highly urban environments, 0.9% of locations were in development and 2.6% were in altered open areas, meaning that they were located in natural areas >95% of the time. Adults were even more rarely in development, just 0.1% of locations for both males and females. Subadult males used development more than other age and sex classes, but only 1.0% of their locations were in development and 97.1% were in natural areas. Use of altered open areas was greater than that of development, although still very low (Table 1).

In terms of home range composition, the pattern was similar, with a very low proportion of mountain lion home ranges consisting of urbanized areas (Table 1). Overall development was just 2.9% of home ranges on average for all animals, with 7.3% of home ranges made up of altered open areas. Adult males used 1.3% development and 7.3% altered open, and thus were slightly more urban-associated than adult females (0.8% development, 5.4% altered open), but for both groups more than 91% of their home ranges consisted of natural land-cover types. Subadults were also a bit more urban-associated than adults, but again, even for subadults >89% of their home ranges on average consisted of natural land-cover types.

As with home range size, the 2 males in isolated patches surrounded by urban neighborhoods and freeways were exceptions to these patterns, using development 58 and 93 times more than other adults. Even for these 2 animals, 88.5–90% of their locations were in natural land-cover types. Similarly, for home range composition, these 2 males

Table 1. Landscape use for mountain lions in and around the Santa Monica Mountains, California, USA, 2002–2016, based on >128,000 locations from global positioning system radio-collars. Pts is the percent of the locations in each land-cover type and HR is the percentage of the home range consisting of that type. We obtained data from 29 different mountain lions, but overall $n = 33$ because 4 animals had both subadult and adult ranges. Home ranges were 100% local convex hull isopleths. We did not include the other classification, which contained multiple land-cover types of very low frequency, or the water classification, which was extremely rare and not likely used. Modified = Altered open + Development.

	Natural land-cover types										Anthropogenic land-cover types					
	Chaparral		Coastal sage scrub		Grassland		Riparian woodland		Upland woodland		Altered open		Development		Modified	
	Pts	HR	Pts	HR	Pts	HR	Pts	HR	Pts	HR	Pts	HR	Pts	HR	Pts	HR
Adult males[a] ($n = 7$)	0.46	0.44	0.20	0.26	0.03	0.06	0.09	0.02	0.14	0.07	0.04	0.07	0.00	0.01	0.04	0.09
Adult male P22	0.34	0.22	0.20	0.22	0.00	0.01	0.07	0.01	0.16	0.07	0.04	0.14	0.06	0.18	0.10	0.32
Adult male P41	0.60	0.59	0.12	0.14	0.02	0.00	0.00	0.01	0.11	0.03	0.02	0.04	0.09	0.16	0.12	0.21
Subadult males ($n = 9$)	0.50	0.43	0.23	0.27	0.03	0.05	0.03	0.02	0.15	0.08	0.02	0.07	0.01	0.04	0.03	0.11
Adult females ($n = 7$)	0.52	0.47	0.19	0.23	0.03	0.07	0.04	0.02	0.16	0.10	0.02	0.05	0.00	0.01	0.02	0.06
Subadult females ($n = 8$)	0.51	0.54	0.26	0.24	0.02	0.03	0.03	0.02	0.10	0.06	0.03	0.06	0.00	0.01	0.04	0.07
All animals ($n = 33$)	0.50	0.46	0.22	0.25	0.02	0.05	0.05	0.02	0.14	0.07	0.03	0.07	0.01	0.03	0.03	0.09

[a] Does not include P22 and P41, animals that occupied very small and isolated ranges.

used >2 times as much modified landscape (development + altered open) as other groups, but still on average only about 25% of their home ranges consisted of these human-altered areas (Table 1).

Use of natural land-cover types.—In terms of natural land cover, mountain lions were most often in the shrubland vegetation types of chaparral and coastal sage scrub, not surprisingly given that these are the dominant vegetation types in the region. For all 4 age-sex classes, chaparral was the most common vegetation type used, at close to or >50% (Table 1), followed by coastal sage scrub at about 20%. When combined as shrublands, this cover type accounted for 66% of adult male locations (excluding P22 and P41) and 71–77% of locations for the other 3 age-sex classes. Upland woodland (mostly oak woodland) was the next most common vegetation type (10.3–15.9%), followed by riparian woodland (3.0–9.0%), and finally grasslands (1.7–3.1%). Males P22 and P41 were relatively similar to other mountain lions in terms of their use of natural land-cover types (more detailed results for P22 and P41 are available online in Supporting Information).

Third-Order Resource Selection

Selection of human land-use types.—Mountain lions of all age and sex classes selected development within their home ranges (Fig. 3A), contrary to our prediction. This selection was especially strong for subadults of both sexes and adult females (Fig. 4). This selection of development was in a distance-based context, which does not necessarily mean they were frequently in development. In fact, the mean distances of mountain lions to development at their telemetry locations ranged from 1,280 m (subadult males) to 1,930 m (adult males) across the 4 age and sex classes (Table S2, available online in Supporting Information). All age and sex classes avoided altered open areas, with males avoiding these areas most strongly (Figs. 3B and 4). Mountain lions of the different sex-age classes differed in their response to trails. Adult females strongly avoided trails, adult males and subadult females selected trails, and subadult males had no significant response (Fig. 4).

Selection of natural land-cover types.—In terms of natural land cover, just as chaparral was the most commonly used vegetation type, it was also strongly selected by all 4 groups (Fig. 4). All 4 age-sex classes also selected coastal sage scrub, most strongly for subadult females (Fig. 4). Riparian woodland was also selected by all 4 classes, but only subadult males selected this vegetation type strongly (Fig. 4). Mountain lions consistently selected upland woodland, except for subadult females who showed no selection or avoidance (Fig. 4). For 3 out of 4 age-sex classes, the only natural land-cover type that was avoided was grasslands, strongly for subadult females, although subadult males selected it. We predicted that grassland would be avoided, but the consistent strong selection of chaparral was contrary to our prediction that riparian and upland woodland would be most strongly selected.

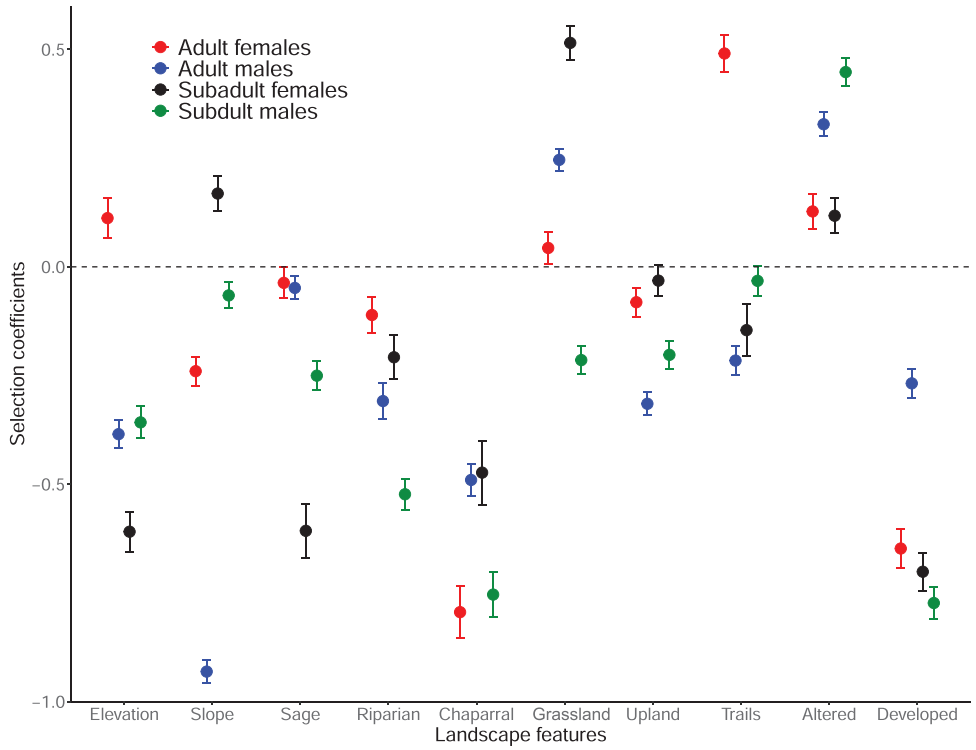

Figure 4. Beta coefficients and 95% confidence intervals from resource selection function models for the different age (adults and subadults) and sex classes of global positioning system collared mountain lions tracked in greater Los Angeles, USA, California, 2002–2016. For classification-based variables (elevation and slope), beta coefficients >0 indicate selection, whereas coefficients <0 indicate avoidance. All other variables were distance-based meaning that coefficients <0 indicate selection, whereas those >0 indicate avoidance. Coefficients with confidence intervals overlapping zero indicate no selection or avoidance. Sage = coastal sage scrub, riparian = riparian woodlands, upland = upland woodlands, altered = altered open areas.

For slope and elevation, there were also some differences between age-sex groups. For elevation, adult females selected higher elevations, whereas all other groups avoided higher elevations, subadult females strongly so. Adults avoided steep slopes, especially adult males (Fig. 4). Subadult males showed much weaker avoidance and subadult females actually selected steeper slopes (Fig. 4). For all 4 age-sex classes, the mean slope for lion locations was around 20% (Table S2). The k-fold cross-validation procedure indicated that the 4 sex- and age-specific models had strong predictive ability; the frequency of cross-validated locations within probability bins were highly correlated with bin ranks ($r_s = 0.915$–0.997).

Individual-level responses to human land use.—At the population-level, there was strong selection of development during all 3 periods of the day (day, crepuscular, and night) that did not vary strongly between these periods. In accordance with our prediction, P22 and P41 showed a similar pattern that differed from mountain lions occupying more remote areas, in that they shifted towards greater avoidance of development during the day and greater selection at night (more detailed results for P22 and P41 are available online in Supporting Information).

Overall, there were not significant functional responses in resource selection for development for any of the time periods (all $P \geq 0.12$). There were significant positive relationships between the difference in selection between crepuscular and night ($F = 8.9$, estimated degrees of freedom (edf) = 2.7, $P < 0.001$, % deviance = 57%, $n = 29$; Fig. 5A) and day and night ($F = 5.8$, edf = 2.3, $P = 0.005$, % deviance = 42%, $n = 29$; Fig. S2A, available online in Supporting Information) and proximity to development. These relationships were influenced by the 2 individuals that were in urban areas more than the other mountain lions that we tracked; both changed their behavior strongly across time periods (more detailed results for P22 and P41 are available online in Supporting Information).

For altered open areas, there was a functional response in resource selection during the day, such that avoidance of altered open areas increased with proximity to them (i.e., $\bar{x}$ distance to altered open decreased across their home range; $F = 4.3$, edf = 6.5, $P = 0.003$, % deviance = 63%, $n = 29$). And as with development, the difference in selection between crepuscular and night ($F = 10.0$, edf = 5.2, $P < 0.001$, % deviance = 74%, $n = 29$; Fig. 5B) and between day and night ($F = 12.5$, edf = 6.0, $P < 0.001$, % deviance = 81%, $n = 29$; Fig. S2B) varied significantly with proximity to altered open areas. Again, the relationships of the differences in selection between time periods were influenced by a few animals who had a lot of altered open area in their home ranges and strongly avoided it (Fig. 3B).

Fire.—Collectively, the 9 mountain lions who had ≥5% of their home range burned by wildfire during the study exhibited a non-significant trend towards selection for burned areas ($\beta = -1.02$, 95% CI = −2.27, 0.23). Variation was high, both between and within individuals, as only 1 mountain lion, a subadult female, showed a clear individual-level response indicating strong selection of burned areas (Fig. S3, available online in Supporting Information). The responses of the other 8 mountain lions varied from trends toward selection or avoidance, but variation was high such that confidence intervals overlapped zero for the remaining 8 individual-level responses (Fig. S3).

DISCUSSION

Response to Development

The fact that mountain lions still persist in and around Los Angeles, one of the largest and most densely populated metropolitan areas in the world, is a testament to the amount of intact natural land cover that remains in and around the city. Our results indicate that mountain lions also exhibited a strong behavioral response to areas dominated by people, supporting our overall hypothesis that anthropogenic landscape modification reduces the value of these areas for mountain lions. First and most importantly, most collared mountain lions were virtually never in developed areas. The fact that for resident (non-dispersing) mountain lions, home range size was positively related to the proportion of development within it also indicates that developed areas reduce the value of otherwise suitable habitat for mountain lions. And the 2 animals that used the highest proportion of development occupied, to our knowledge, 2 of the smallest home ranges ever recorded for adult males of the species, indicating that when faced with a choice between venturing across freeways and through intense urbanization, they instead greatly restricted the size of their home ranges. Access to females is thought to be the primary motivator for the large home ranges of adult male mountain lions. For P22 in Griffith Park, he has never shared that area with females based on extensive remote camera data. In the Verdugo Mountains, P41 did have access to a single female, again based on remote camera detections, whereas adult males often have access to multiple females. Thus, the freeways and urbanization surrounding these habitat fragments appeared to represent such substantial barriers to movement that these males constrained their space use despite the limited mating opportunities.

Our results also highlight the flexibility of mountain lions, in that they can take advantage of opportunities provided by human activities and navigate even intense development when necessary. After selection of chaparral, the most consistent result of our resource selection analyses was the selection of development (Fig. 4), indicating that they were regularly closer to it than expected. This was consistent with previous work showing that mountain lions in this population killed and consumed deer closer than expected to development (Benson et al. 2016*b*). We speculate that mule deer may be taking advantage of lush vegetation in developed and altered areas (DeStefano and DeGraaf 2003, Bender et al. 2004, Wilmers et al. 2013), thus attracting mountain lions to urban edges. The behavior of P22 and P41 (Fig. S4, Discussion, available online in Supporting Information) suggests that individual animals are able to alter their behavior patterns to take advantage of human landscapes at times when people are less active.

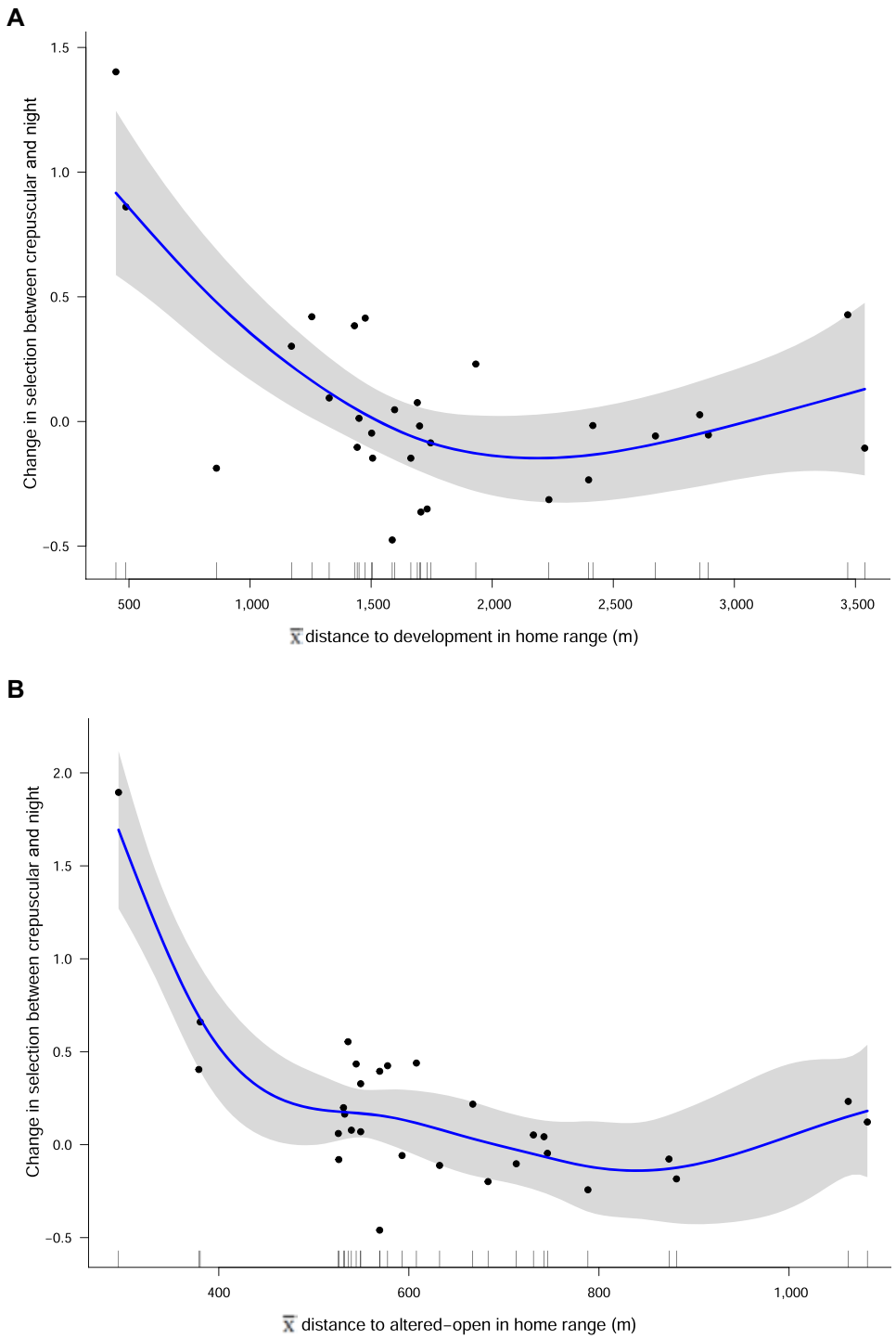

Figure 5. Relationships with 95% confidence intervals (shaded areas) estimated from generalized additive models of the differences in individual-level selection coefficients between crepuscular and night periods relative to distance-based availability of development (A) and altered open areas (B) for mountain lions in greater Los Angeles, California, USA, 2002–2016.

Most mountain lions in our study selected development regardless of time of day, perhaps because their primary prey species (mule deer) responded positively to urbanization. The 2 mountain lions in areas of greater development exhibited strong differences in selection of development between day and night, in a way that mountain lions in more remote areas did not. This was likely a direct response to urbanization and the disturbance that it causes for animals that are faced with it on a regular basis. To more directly address our hypothesis of the selection of development being related to abundance and activity of deer, we would need more information on how mule deer interact with urban and suburban landscapes in our system. Unfortunately, there are very few studies about urban mule deer generally, or about their movements and habitat use in urban landscapes specifically (Bender et al. 2004, McClure

et al. 2005). Preliminary information from 6 GPS-collared mule deer in our study area showed intensive and regular use of residential developed areas and altered open areas such as golf courses (J. L. Brown, National Park Service, unpublished data).

If mountain lions are indeed selecting urban edges because of heavy use of those edges by mule deer that are taking advantage of anthropogenic vegetation, then this would be an example of a secondary urban resource subsidy (Dunagan et al. 2019). Omnivorous species such as raccoons and coyotes that reach high densities in urban areas (Gehrt and Riley 2010, Hadidian et al. 2010) can receive a primary urban resource subsidy by directly consuming anthropogenic resources such as trash, ornamental fruit, or pets (Larson et al. 2020), and obligate carnivores such as mountain lions or bobcats may benefit indirectly from urbanization if their prey populations are augmented (e.g., bobcats and rabbits; Dunagan et al. 2019).

Response to Natural and Altered Open Land-Cover Types

Overall, the mountain lions in our study consistently selected native vegetation types with dense cover: chaparral, riparian woodland, and coastal sage scrub (Fig. 4). The 2 features of the landscape that they consistently avoided were grasslands and altered open areas, which were also the most open portions of the landscape. These results are consistent with previous work showing that mountain lions select areas with dense stalking cover and avoid open areas to facilitate hunting success (Atwood et al. 2007), and in a statewide analysis including 13 different study areas, Dellinger et al. (2020) reported selection for shrub cover and avoidance of open areas. Mountain lions are ambush predators, and predators may select areas where the probability of killing is maximized, rather than areas where encounter rates are highest (Hopcraft et al. 2005). Mountain lions rarely killed deer in grasslands (referred to as prairie-meadow) or altered open areas relative to thicker vegetation types (Benson et al. 2016*b*). Because encounters with prey are virtually impossible to directly observe, relatively little is known about the specific factors associated with mountain lion hunting success. Prey species appear to be more vulnerable to, and wary of, mountain lions in more closed vegetation types, whereas coursing predators such as wolves may be more of a threat in open areas (Atwood et al. 2009). Recently burned areas may also lack sufficient stalking cover for mountain lions to successfully prey on deer, providing a potential explanation for why these areas were not strongly selected by all mountain lions.

The consistent avoidance of altered open areas (Figs. 3B and 4) indicates that although these land-cover types may have value for bobcats and coyotes (Riley et al. 2003), it may not be the case for mountain lions. The selection of dense cover and avoidance of open areas could also be because some mountain lions, particularly females and subadult males, are at risk for violent and even deadly encounters with adult males (Riley et al. 2014, Benson et al. 2020). Finally, in the altered open areas, they may feel threatened by people, as suggested by the diel variation in selection; an avoidance response to humans has been documented in other mountain lion populations in California (Smith et al. 2015).

Comparison with Other Studies of Mountain Lions and Development

A number of other recent studies of mountain lions and human development in the western United States included resource selection analyses, which collectively indicated that mountain lions avoided residential areas, although generally these studies were largely in lower density suburban or exurban areas (Kertson et al. 2011, Wilmers et al. 2013, Nicholson et al. 2014, Blecha et al. 2018) as opposed to higher density urban areas. This accords with our results of almost no use of development by 94% of lions and of consistent avoidance of altered open areas. The strong distance-based selection of development that we documented is potentially different from what has been found in other places, but these other studies also consistently determined that mountain lions were flexible in their ability to take advantage of available resources in the complex landscapes created by humans. For example, in western Washington, mountain lions used remaining natural areas and corridors within the exurban residential areas (Kertson et al. 2011), and in Colorado mountain lions hunted near residences, especially as hunger increased (Blecha et al. 2018). In the Santa Cruz Mountains, mountain lions avoided residences during reproductive behaviors, but avoidance was much weaker while moving and feeding (Wilmers et al. 2013). In all 3 areas, diet studies indicated that mountain lions expanded their diets in residential areas to include smaller omnivorous or domestic animals (Kertson et al. 2011, Moss et al. 2016, Smith et al. 2016). Similarly, in a reserve outside Jaipur, India, the leopard diet consisted of 90% domestic species, mostly dogs (Kumbhojkar et al. 2021). In combination, our landscape use and selection results reflect the behavioral response of mountain lions to development in the Los Angeles area, where being close to humans has costs (e.g., human-caused mortality; Benson et al. 2020) and benefits (e.g., higher probability of killing mule deer; Benson et al. 2016*b*).

There were important differences between age and sex classes, and on an individual level for the 2 males occupying highly urban environments. Other studies, while also reporting significant individual-level variation, in general have not seen a functional response (Burdett et al. 2010, Kertson et al. 2011, Wilmers et al. 2013); although Knopff et al. (2014) reported that individuals exposed to agricultural and low-density development avoided these areas less than wilderness animals. Lions P22 and P41 did modify their behavior in response to development by using and selecting it at night but avoiding it more than other mountain lions during the day (Supporting Information). Similarly, Kertson et al. (2011) reported that when mountain lions moved between patches or covered greater distances in residential areas, it was only at night and movement rates were significantly higher. Wang et al. (2017) also reported faster rates of movement and therefore higher caloric cost

for mountain lions when using exurban residential areas in central California.

In terms of age and sex differences, Blecha et al. (2018) and Alldredge et al. (2019) reported that males avoided residential development more than females in Colorado, as did Wilmers et al. (2013) in Santa Cruz. Kertson et al. (2013) did not report sexual differences in residential use in Washington. Though in our study area, both sexes were almost never found in urban areas, both selected areas closer than expected to development, and females did so more than males, a similar trend to the greater male avoidance in other regions.

Importance of the Use and Configuration of Development

In general, other researchers have reported selection relative to development or residential areas but almost never its actual use, as we have done here (Table 1). It would be valuable to more regularly report the actual numbers, and proportions, of locations that were in developed or residential areas (Riley et al. 2010) because this is very relevant for human-wildlife conflicts and people's perception of risk from mountain lions. In Washington, Kertson et al. (2013) did report that mean home range overlap of mountain lions with residential areas was 18.35%; however, this was generally in low-density, exurban development. Alldredge et al. (2019) computed mountain lion use of urban (>10 houses/ha) and suburban (1.47–10 houses/ha) areas of Colorado's Front Range and reported the percentage of animals that never used urban (85% of males, 74% of females) or suburban (33% of males, 14% of females) areas, and that use of both occurred overwhelmingly (85% for urban, 62% for suburban) between 2200 and 0500. They also reported that older females regularly used higher density housing areas. Burdett et al. (2010) presented habitat composition for home ranges in the Santa Anas and Peninsular Ranges, California, although urban and suburban areas were combined. Only 0.6% of home ranges on average was made up of urban-suburban areas, with a range of just 0.3% to 0.9%. In contrast, we had an average of 2.9% of home ranges made up of urban development, with a range of 0.0 to 18.0%. Dickson and Beier (2002) reported habitat use in the Santa Anas, where developed areas made up <5% of home ranges and <5% of locations were in them, with males being more urban than females.

The configuration of development and roads relative to large natural areas is also very likely to affect results. In Colorado, Washington, and Santa Cruz, there were extensive natural areas immediately adjacent to the most intense development. By contrast in our study area, the Santa Monica Mountains are isolated from additional natural areas by anthropogenic barriers, and the Verdugo Mountains and Griffith Park are isolated and small (Fig. 1). Thus, in our study virtually every animal, particularly adult males and subadults but even adult females, was relatively close to humans and their structures. South of Los Angeles, the Santa Ana Mountains are similarly isolated by the ocean, freeways, and development, but it is unclear if mountain lion behavior there varies from that in nearby areas. In some studies, the Santa Anas were combined in analyses with the Peninsular Ranges, which were less isolated by freeways and development (Burdett et al. 2010, Jennings et al. 2016). In an earlier study, Dickson and Beier (2002) reported that mountain lions in the Santa Anas were avoiding human-dominated areas including agriculture and urban development for third- (within home range) and second-order (landscape level) resource selection. Given evidence that mountain lions use or select developed areas more at night (Alldredge et al. 2019, this study), the lack of night locations (12%) may have underrepresented the use of development (Dickson and Beier 2002).

Importance of Shrublands to Mountain Lions

In terms of natural vegetation types, our study area differed in terms of habitat composition from those in Colorado (Blecha et al. 2018) and Washington (Kertson et al. 2011), where the natural areas were heavily forested, and conifer forest presence and canopy cover were important positive predictors of mountain lion selection. In the Santa Cruz Mountains, also a much more forested environment, mountain lions selected forests and shrublands during movement (Wilmers et al. 2013). The other southern California studies have repeatedly emphasized selection of riparian woodland, oak woodland, and the conifer forest present in the Peninsular Ranges (Dickson and Beier 2002, Burdett et al. 2010, Jennings et al. 2016, Zeller et al. 2017). The response of mountain lions to shrub vegetation types such as chaparral and coastal sage scrub has generally been reported as neutral, or in some cases even as avoidance (Burdett et al. 2010), such that the importance of these vegetation types has not been emphasized. Our research highlights the importance of shrub communities for mountain lions based on the consistent selection of chaparral and coastal sage scrub, and on average >70% of GPS locations were in shrub vegetation types (Table 1). Dellinger et al. (2020) also reported consistent selection of shrub cover in their statewide analysis. Available habitat use data from other southern California studies similarly reflect the dominance of shrub vegetation types, where they made up >50% of home ranges (Burdett et al. 2010) or of both locations and home ranges (Dickson and Beier 2002). Dickson and Beier (2002) mentioned that scrub vegetation in the Santa Anas typically had vegetation height <0.5 m and likely provided little stalking cover. In our study area, coastal sage scrub and certainly chaparral include extensive areas where vegetation is ≥1 m tall, and in an analysis of mule deer kill-sites (Benson et al. 2016*b*), 77% of the 420 kills were in chaparral or coastal sage scrub. We argue that shrub communities, chaparral in particular, are by far the most important natural vegetation types supporting mountain lion populations in coastal southern California.

Mountain Lion Conservation in Urban Landscapes

When sufficient natural land cover is maintained, even when surrounded by major freeways and intense urbanization, mountain lions can navigate the landscape, find and effectively hunt sufficient prey, find mates, breed, and raise young.

And importantly they can do so without significant direct conflict with humans. As of 2021 we studied >90 mountain lions for 19 years in the Santa Monica Mountains area, and we have just one record of a mountain lion behaving aggressively towards people, a 10-month-old kitten that attacked a 5-year-old boy (J. A. Sikich, National Park Service, unpublished data). It is likely that every animal in our study has been close to (i.e., within 100 m of) humans regularly, if not daily, as people recreate in the park or just inhabit their homes. The spatial and temporal behavioral responses we documented highlight that mountain lions, an apex predator and large carnivore, are effective at living in human-dominated landscapes and rarely interacting directly with humans. Alldredge et al. (2019) specifically studied mountain lion-human interactions on Colorado's Front Range, and the interactions were limited to sightings, lions preying on pets or livestock, and animals in undesirable locations. Similarly, Kertson et al. (2013) documented just 21 interactions over 4 years in their study area in Washington: 14 depredations, 3 sightings, and 4 encounters. Fortunately, mountain lions do not generally consider humans to be suitable prey.

Two of our results are particularly important for the conservation of urban mountain lion populations. One is the consistent, distance-based selection of development by mountain lions, despite rarely entering it. We hypothesize that developed areas are beneficial to and used by mule deer, their main prey, and that this explains the strong selection by mountain lions. If our hypothesis is correct, areas along the edges between urban areas and wildlands, or in lower density residential areas in other parts of the west such as the Santa Cruz Mountains or Colorado's Front Range, may have the highest potential for interactions between mountain lions and people and for conflict with pets or other domestic animals. If true, land or wildlife managers wishing to reduce these potential conflicts could consider working with local residents to reduce the attractiveness of neighboring residential or landscaped areas to deer. Another possibility is that mountain lions are closer to development to prey on denser populations of smaller species such as raccoons (Hadidian et al. 2010), rabbits (Dunagan et al. 2019), or domestic cats (Fig. S5, available online in Supporting Information), which has been cited as a cause for mountain lion use of exurban areas in Colorado (Moss et al. 2016), Washington (Robins et al. 2019), and the Santa Cruz Mountains (Smith et al. 2016).

The other notable result is the heavy use and strong selection of shrublands, namely chaparral and coastal sage scrub, by mountain lions in southern California. Mountain lions are often thought of as a species of the forests and mountains across the West, but they are clearly also strongly associated with shrub-covered hills in southern California. Although rarer vegetation types such as oak woodlands or riparian areas may be strongly selected, given the dominance of shrublands among natural vegetation in coastal southern California and their strong use and selection by mountain lions, conservation of chaparral and coastal sage scrub communities should be a high priority to aid in the persistence of the species throughout the region.

MANAGEMENT IMPLICATIONS

Wildlife and land managers should be aware that mountain lions may persist in urban landscapes, even in and around a megacity such as Los Angeles. Our results indicate that the amount of actual use of development may be very low, but it may be more common for individuals that occupy smaller habitat fragments surrounded by intensive human land use, particularly during the night. Moreover, mountain lions in larger patches that may rarely enter urban areas may be closer than expected to development, likely because of the presence of a resource such as prey. Other forms of developed open space, including landscaped areas such as cemeteries, golf courses, or parks, may be avoided, perhaps because of the lack of cover. Therefore, interactions in urban areas between people, pets, or livestock and mountain lions may be more likely near habitat fragments occupied by them. In larger natural areas, such interactions may be more likely closer to development rather than in the most remote regions. Managers should also be aware that shrublands such as chaparral are preferred and regularly used by mountain lions, so habitat patches dominated by shrubs should be actively preserved to conserve threatened populations. An important requirement for the effective conservation of at-risk mountain lion populations in southern California is preserving and enhancing connectivity between larger natural areas. The use and selection of shrublands and the avoidance of landscape elements without cover (grasslands, landscaped areas) can be used to restore or prioritize habitat linkages aimed at providing that connectivity. Finally, as the state of California is considering mountain lions along the coast, including the population that we studied, for listing under the state Endangered Species Act during 2020–2021, our results about landscape use can help planners in many jurisdictions evaluate how to best protect the habitat that mountain lions require.

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SUPPORTING INFORMATION

Additional supporting information may be found in the online version of this article at the publisher's website.

APPENDIX B

Dudek's Project and Cumulative Analysis

APPENDIX B.1

Mountain Lion Impact Analysis

Mountain Lion Impact Analysis

Sterling Ranch Estates Residential Project

APRIL 2023

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EXHIBITS

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
amsl	above mean sea level
CDFW	California Department of Fish and Wildlife
County	County of Los Angeles Department of Regional Planning
DEIR	Draft Environmental Impact Report
I	Interstate
MM	Mitigation Measure
Project	Sterling Ranch Estates Residential Project
SR	State Route
VTTM site	Vesting Tentative Tract Map No. 60257

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1 Introduction

This report provides the information and analysis requested by the California Department of Fish and Wildlife (CDFW) to assist in determining the potential effects of the Sterling Ranch Estates Residential Project (Project) to impact mountain lion (*Puma concolor*).

CDFW provided comments to the County of Los Angeles Department of Regional Planning (County) on the Draft Environmental Impact Report (DEIR) prepared by the County for the Project. A meeting to review and discuss these comments was held on June 13, 2022, with CDFW and County staff, Dudek staff, Meridian Consultants (EIR preparer), and the Project applicant's team. CDFW provided additional information in email messages after this meeting.

This report addresses the following potential impacts to mountain lions identified by CDFW:

1. Introduction of new or additional barriers to movement of mountain lions.
2. Constraining or eliminating essential movement corridors.
3. Habitat loss, fragmentation, and encroachment:
    a. Identify and discuss the number, location and configuration of landscape linkages/landscape blocks within the Project area and adjacent areas. CDFW recommended referencing CDFW's Natural Landscape Blocks dataset (DS 621).
    b. Identify and discuss the acreage of mountain lion habitat suitability (a proxy for mountain lion permeability and use) within the Project site and adjacent areas. CDFW recommended referencing CDFW's Mountain Lion Habitat Suitability dataset (DS 2916) and Mountain Lion Predicted Habitat CWHW dataset (DS 2616).
    c. Provide analysis of current landscape intactness considering the level of development around the Project site, and how the Project may impact habitat connectivity or impede mountain lion movement across the landscape to remaining adjacent habitat areas.
4. Increased human presence, traffic, noise, and lighting, as well as introduction of any livestock or animal keeping.
5. Increased fire risk.
6. Use of herbicides, pesticides, and rodenticides.

1.1 Project Site Location

The Sterling Ranch Estates Residential Project consists of a proposal to subdivide a 113.9-acre property at 29053 Coolidge Avenue within the Val Verde community of the Castaic Community Area of the Santa Clarita Valley in Los Angeles County, approximately 35 miles northwest of downtown Los Angeles and 2 miles west of the City of Santa Clarita. Vesting Tentative Tract Map No. 60257 (VTTM site) is proposed to subdivide the site. The VTTM site lies on both sides of Del Valle Road, southwest of Hasley Canyon Road.

In addition to the VTTM site, the Project includes off-site components proposed within areas referred to herein as the "Off-Site Improvement Area" and the "Off-Site Open Space Dedication Area." The Off-Site Improvement Area totals 12.6 acres and consists of areas referred to as the Off-Site Water Tank Area, the Off-Site Water Line Improvement Area, the Off-Site Sewer Line Improvement Area, and the Off-Site Roadway Improvement Area. The

Off-Site Open Space Dedication Area includes 37.9 acres owned by the applicant proposed for permanent preservation. Collectively, the VTTM site, Off-Site Improvement Area, and Off-Site Open Space Dedication Area make up the total Project site of 164.4 acres (Figure 1, Project Location).

1.2 Project Description

Sterling Gateway, LP (the applicant) proposes the Project, consisting of the proposed subdivision of the 113.9-gross-acre VTTM site into 247 lots, of which 222 lots would be for detached single-family residential lots. The Project includes approximately 50.5 acres of related off-site components within a total of approximately 164.4 acres.

These off-site components include the following:

- Construction of a 1-million-gallon water tank
- Upsizing of the existing water line within Hasley Canyon Road
- Construction of a sewer line within Del Valle Road to Hasley Canyon Road
- Improvements of Del Valle Road
- Dedication of an off-site trail easement
- Dedication of an off-site permanent open space easement

1.3 Biological Setting

The Project site is within the Transverse Range geomorphic province of Southern California. Topographically, the VTTM site, Off-Site Roadway Improvement Area, and Off-Site Open Space Dedication Area vary from flat to moderate north- and south-facing slopes with elevations ranging from approximately 1,200 feet above mean sea level (amsl) along the southern boundary to approximately 1,400 feet amsl in the northeastern portion of these areas. Topographically, the Off-Site Water Tank Area consists of moderate north- and south-facing slopes with elevations ranging from approximately 1,550 feet amsl along the northern boundary to approximately 1,750 feet amsl in the southern portion of the site. The Off-Site Water Line Improvement Area and the Off-Site Sewer Line Improvement Area range in elevation from approximately 1,100 feet amsl to 1,300 feet amsl. Soils present within the Project site generally consist of loams, sandy loams, and silty clay loams, which are derived from sedimentary rock or granite.

The Project region has a Mediterranean climate with cool, wet winters and hot, dry summers. Rainfall occurs primarily from October through March. The Project region is in a broad ecological and biogeographic transition zone for the coastal and mountain ecoregions. The Santa Clara River Valley also provides access via the Santa Clara River to the edges of the Mojave Desert and the foothills of the San Gabriel Mountains. Although much of the region has been subject to rapid urbanization and historical agricultural and oil development practices, large areas of open space and natural lands border the region (Figure 2, Project Region). The Los Padres National Forest is north of the Project site, and the Angeles National Forest lies to the north and east, both of which are greater than 5 miles from the Project site. The Santa Susana Mountains, a region of gently rolling hills and sharp, steep-walled canyons, are south of the Project site and south of the Santa Clara River.

1.3.1 Existing Vegetation Communities On-Site

As discussed in the Biological Technical Report and DEIR, 18 vegetation communities identified in A Manual of California Vegetation, Second Edition and CDFW Natural Communities List, were mapped during field surveys of the VTTM site and Off-Site Improvement Area (Dudek 2020; Meridian Consultants 2021). Two land cover types characterized as disturbed habitat and urban/developed were also mapped in association with built area and areas of anthropogenic influence on the VTTM site. These vegetation communities and land cover types are described below. Vegetation communities are summarized in Table 1, Existing Project Site Vegetation Communities and Land Cover Types. Figure 3A identifies the locations of the vegetation communities within the VTTM site, Off-Site Roadway Improvement Area, and Off-Site Open Space Dedication Area. Figure 3B identifies the locations of the vegetation communities within the Off-Site Water Tank Area. Figure 3C identifies the locations of the vegetation communities within the Off-Site Water Line Improvement Area and the Off-Site Sewer Line Improvement Area. The total acreages presented in the tables and discussion below reflect rounding of values.

Table 1. Existing Project Site Vegetation Communities and Mountain Lion Habitat Suitability

Vegetation Community	Mountain Lion Habitat Suitability[1]	Tract Map Site (acres)	Project Accessories (acres)	Grand Total (acres)
Coast Live Oak Woodland (*Quercus agrifolia*) Alliance	Low	0	0.3	0.3
Schinus molle Association - *Ailanthus altissima Semi-natural Association - Eucalyptus* (*globulus, camaldulensis*) Provisional Semi-Natural Association	Low	0.5	0	0.5
Woodland Total:	**Low**	**0.5**	**0.3**	**0.8**
Arroyo Willow Thickets (*Salix lasiolepis*) Alliance	Low	0.1	0	0.1
Mulefat Thickets (*Baccharis salicifolia*) Alliance	Low	0.1	0	0.1
Rhus trilobata Association	Low	0.9	0	0.9
Riparian Total:	**Low**	**1.1**	**0**	**1.1**
Chamise – Black Sage Chaparral (*Adenostoma fasciculatum - Salvia mellifera*) Alliance	High	0.7	0	0.7
Chaparral Total:	**High**	**0.7**	**0**	**0.7**
Black Sage Scrub (*Salvia mellifera*) Alliance	Moderate	0	0.3	0.3
California Buckwheat Scrub (*Eriogonum fasciculatum*) Alliance	Moderate	0.3		0.6
California Sagebrush – Black Sage Scrub (*Artemisia californica - Salvia mellifera*) Alliance	Moderate		0.50	0.5

Table 1. Existing Project Site Vegetation Communities and Mountain Lion Habitat Suitability

Vegetation Community	Mountain Lion Habitat Suitability[1]	Tract Map Site (acres)	Project Accessories (acres)	Grand Total (acres)
California Sagebrush – California Buckwheat Scrub (*Artemisia californica - Eriogonum fasciculatum*) Alliance	Moderate	24.8	2.5	27.3
California Sagebrush Scrub (*Artemisia californica*) Alliance	Moderate	5.4	0.6	6.0
Coyote Brush Scrub (*Baccharis pilularis*) Alliance	Moderate	0.0	0.1	0.1
Palmer's goldenbush scrub (*Ericameria palmeri*) Provisional Alliance	Low	6.7	0	6.7
Purple Sage Scrub (*Salvia leucophylla*) Alliance	Moderate	5.5	0	7.8
Coastal Scrub Total:				**49.3**
Brassica nigra - Bromus diandrus Semi-Natural Association	Low	12.4	0	12.4
Bromus diandrus Semi-Natural Association	Low	7.3	0	7.3
Wild Oats And Annual Brome Grasslands (*Avena* spp. - *Bromus* spp.) Semi-Natural Alliance	Low	39.8	0	44.8
Grass and Forb Dominated Total:	**Low**	**64.6**	**0**	**64.6**
Disturbed Habitat	Low	5.1	0	7.8
Urban/Developed	Low	5.6	0	9.5
Disturbed and Developed Total	*Low*	10.7	*0*	17.3
Grand Total	**Low to High**	**114.3**		**164.8**

[1] Mountain lion habitat use by vegetation type in Los Angeles County adopted from Riley et al. (2021). Chapparal most common vegetation type used >50% (High Quality), followed by coastal scrub 20% (Moderate Quality), oak woodland (10.3%–15.9%), riparian (3.0%–9.0%) and grasslands (1.7%–3.1%) (Low Quality).

1.3.1.1 Habitat Suitability for Mountain Lion

Habitat suitability for mountain lion was based on available literature, extensive field surveys, habitat suitability modeling, and a long-term study that focused on mountain lions in the Los Angeles area.

1.3.1.2 Field Survey Results and Habitat Suitability

Dudek biologists conducted surveys on the Project site during 2016, 2017, 2018, and 2020 that consisted of more than 248 person-hours and full-coverage surveys. Mule deer (*Odocoileus hemionus*), the primary prey item of mountain lion, were observed on three occasions foraging on the Project site, specifically within the VTTM site. Mountain lions or their sign (i.e., scat and/or tracks) were not observed on the Project site during 4 years of intensive, full-coverage biological field surveys. Although the vegetation present on the Project site does not have

the density, height, or coverage sought after by mountain lion, its primary prey item was present and, therefore, there is potential that a mountain lion could potentially pursue prey onto the site.

There is potential for mountain lion to move onto and use the Project site based on presence of approximately 50 acres of coastal scrub habitat and mountain lion's primary prey item, mule deer. The potential to occur is based on habitat suitability: scrub vegetation, presence of mule deer, and proximity to high-quality habitat on large swaths of public lands to the west/northwest. However, it is less likely that a mountain lion would reach the site from all other directions due to existing impediments and poor-quality or open disturbed habitat.

Mountain lions may occasionally travel from natural open space in the west to the east, and possibly onto the Project site to hunt mule deer. A mountain lion pursuit of a mule deer may lead it to the site, but the poor-quality habitat and small size of open space between the surrounding development would not support long-term cover, mate attraction, breeding, or a natal den. The Project site supports limited resources for a mountain lion. Due to the sparce, open, and short vegetation on site, a mountain lion is not expected to expand its territory onto the site or move through the site to areas to the south or east to Interstate (I) 5, a sink for mountain lion, similar to, but more significant than, State Route (SR) 126 to the south near Newhall Ranch.

The long-term study and modeling discussed below further refine habitat suitability and potential movement of mountain lion onto and through the Project site and surrounding land.

1.3.2 Long-Term Study – Mountain Lions in Greater Los Angeles

A study titled "Big Cats in the Big City: Spatial Ecology of Mountain Lions in Greater Los Angeles" by Seth Riley, Jeff Sikich, and John Benson was published by the Journal of Wildlife Management in November 2021 (Riley et al. 2021). The focus of the study as described in the article was to better understand mountain lion habitat use near urban and managed areas, which included three predictors: home range, landscape use, and resources selection. To analyze these predictors, researchers used GPS collar telemetry data and modeling software. The conclusions of the study support the information, analysis, and conclusions in the DEIR that the Project would not result in significant impacts to mountain lions in Los Angeles County, as further described below.

Home Range

"Home range" is considered the same as "territory" for the purposes of the study (Jeff Sikich, pers. comm.). The study estimated the territories for 29 tracked mountain lions, including seven in the Santa Susana Mountains, with one north of SR-126. The study did not identify a mountain lion on or adjacent to the Project site using telemetry data during the 14-year study (2002 to 2016). However, one adult male established a portion of his home range approximately 1.5 miles (8,000 feet) northwest of the Project site, but never entered the Project site over the study period. For reference, the mean home range for adult male mountain lions is 91,923 acres, and the mean home range for adult female mountain lions is 33,122 acres. Therefore, even if the entire Project site were part of the territory of a mountain lion, the site would only consist of a small percentage of its territory (i.e., 0.12% of the average home range for a male and 0.34% of the average home range for a female). Nonetheless, as discussed in the DEIR (Meridian Consultants 2021), mountain lions may occasionally use the Project site based on the mean home range size for individual mountain lions and the potential for prey to be present on the Project site.

Landscape Use

For all mountain lions studied (adult and juvenile males and females), only 0.9% of locations where mountain lions were present consisted of developed areas, and 2.6% of locations were altered open areas, meaning that mountain lions were located in natural areas more than 95% of the time (Riley et al. 2021). In the study, "altered open spaces" were defined as areas modified by humans to a lesser extent than completely developed areas and included golf courses, schools, landscaped areas such as city parks, and low-density residential areas. The Project site is undeveloped land, but residential, commercial/industrial, and oil field operations are west, south, and east of the Project site. Based on the study, the surroundings of the Project site greatly reduces the attractiveness of the site for hunting, sheltering, and denning by mountain lions. The only connection to nearby open space areas is the undeveloped land northwest of the Project site.

Resource Selection

Of the natural landcover in Los Angeles County, chaparral was the most common vegetation type used by mountain lions, with chaparral used close to or greater than 50% of the time, followed by coastal sage scrub at approximately 20% of the time. The 0.70 acres of chaparral and 79.7 acres of coastal scrub present on the Project site occur in patchy areas separated by regularly maintained dirt roads and open grass and herb-dominated areas, decreasing the continuity of these key coastal sage scrub and chaparral vegetation communities in a manner that results in poor-cover habitat for mountain lions. The majority of the scrub habitats on the Project site are 30% to 60% relative cover, meaning these are "open" or "thinner" scrub habitats characterized by short vegetation structure. For instance, Palmer's goldenbush scrub, a transitional or successional community, grows less than 1 meter tall and is open with lower percent coverage, often in disturbed or recovering lands. These types of habitats are not typically preferred by mountain lions. The Project would impact 42.8 acres of the 79.7 acres of coastal scrub habitat present on the site.

Per Riley et al. (2021):

> Overall, the mountain lions in our study consistently selected native vegetation types with dense cover: chaparral, riparian woodland, and coastal sage scrub. The two features of the landscape that they consistently avoided were grasslands and altered open areas, which were also the most open portions of the landscape. These results are consistent with previous work showing that mountain lions select areas with dense stalking cover and avoid open areas to facilitate hunting success (Atwood et al. 2007), and in a statewide analysis including 13 different study areas, Dellinger et al. (2020) reported selection for shrub cover and avoidance of open areas.

In general, mountain lion use of urban areas was very low, and shrub vegetation types, especially chaparral, were identified as important in terms of mountain lion habitat use and resource selection. More specifically, the radio-tracked mountain lions consistently selected native vegetation types with dense cover: chaparral, riparian woodland, and coastal sage scrub. As discussed above, the Project site contains coastal scrub and limited chaparral vegetation communities, which comprise slightly more than one-third of the Project site; however, this vegetation is interspersed with open areas of grass, herb-dominated vegetation communities, and disturbed and developed lands. The coastal sage scrub and chaparral on the Project site occur in patchy areas within regularly maintained dirt roads, and open grass and herb-dominated areas, decreasing the continuity of these key coastal sage scrub and chaparral vegetation communities. General, the coastal sage scrub and limited chaparral vegetation communities on the Project site have a relatively short canopy height and are located on slopes. No continuous,

dense chaparral or coastal sage scrub connects the site to off-site areas, resulting in the habitat present on the Project site being less desirable to mountain lions.

Based on habitat suitability (vegetation, land use, and home range) and use by mountain lions in the Los Angeles area as adopted from Riley et al. (2021), the Project site primarily contains low-quality habitat for mountain lions. Of the vegetation types present, the Project site is composed of 90.5 acres of low-quality habitat, or 67.64% of the site; 43.6 acres of moderate-quality habitat, or 32.59% of the site; and 0.7 acres of high-quality habitat, or 0.5% of the Project site (Table 1). Note that oak woodland and riparian habitats are considered low quality habitat for mountain lions in Los Angeles County due to their infrequent use and abundance, small size, and sparse and open coverage, particularly in the Project area. In addition, mountain lions rarely visit residential areas, even rural ones, such as parts of Val Verde and Hasley Canyon. The surrounding land uses reduce the suitability of the habitat on site for use by mountain lions. Therefore, when mountain lion land use and lower-quality habitat present on the site are considered together, the Project site contains relatively low-quality habitat for mountain lion.

1.3.3 Habitat Suitability Modeling for Mountain Lions in California

CDFW requested review of the habitat model (GIS metadata) that has its origins in "Using Mountain Lion Habitat Selection in Management" that was published in The Journal of Wildlife Management (Dellinger et al. 2019). Dellinger et al. (2019) was published two years prior to Riley et al. (2021) and did not include Los Angeles County or Riley et al. (2021) mountain lion data. The Dellinger et al. (2019) model is comprehensive, but lacks specific vegetation components, instead focusing habitat selection on four general variables: forest cover, open landscapes, shrub cover, and impervious surfaces, which is useful for a state-wide model; however, Riley et al. (2021) provides a much clearer picture of mountain lion habitat use in Los Angeles County. Dellinger et al. (2019) does include several important habitat suitability variables, including elevation; slope; ruggedness; distance to secondary roads (i.e., dirt roads); distance to year-round water; and biotic variables, such as human density, distance to forest cover, open landscape, shrub cover, impervious surfaces, and deer prevalence.

Per Dellinger et al. (2019), habitat suitability based on the model ranks from poor (1) to good quality habitat (10) for mountain lion. Table 2 provides the habitat value, counts, and percent found on the Project site and in the vicinity (10-mile radius). Refer to Figure 4, Mountain Lion Habitat Suitability within the Vicinity of the Project Site, and Figure 5, Mountain Lion Habitat Suitability in Project Areas, for a visual depiction of the data on and around the Project site. Table 2 provides the results of the model for the Project site and the area within 10 miles of the Project site.

Table 2. Mountain Lion Habitat Suitability for the Sterling Ranch Project Site

Mountain Lion Habitat Quality	Mountain Lion Habitat in 10-Mile Radius (acres)[1]	Mountain Lion Habitat on Project Site (acres)[1]	Percent Impact on Habitat from Project
Good (8–10)	8,670	0.0	0.000
Moderate (4–7)	166,793	14.23	0.009
Poor (1–3)	63,502	98.52	0.002

Source: Dellinger et al. 2019

[1] Acreages are estimated due to the Dellinger et. al. (2019) model's resolution

Similar to the adoption of Riley et al. (2021) data, the Dellinger et al. (2019) model results for mountain lion identifies the Project site as primarily containing poor-habitat suitability. According to the Dellinger et al. (2019)

model, the Project site contains 87.37% poor-quality habitat for mountain lion in comparison to 67.64% from the Riley et al. (2021) model. Very limited good-quality habitat is available, and moderate habitat, although fragmented, accounts for 12.62% (Dellinger) or 32.59% (Riley) of the Project site. See Table 3 for the comparison.

Table 3. Mountain Lion Habitat Suitability for the Sterling Ranch Project Site Comparison

Mountain Lion Habitat Quality	Dellinger et al. 2019 (Units)	Dellinger et al. 2019 (Percent)	Riley et al. 2021 (Acres)	Riley et al. 2021 (Percent)
Good (8–10)	0.0	0.0	0.70	0.52
Moderate (4–7)	14.23	12.62	4.14	32.59
Poor (1–3)	98.52	**87.37**	90.5	**67.64**

Sources: Dellinger et al. 2019; [adopted from] Riley et al. 2021

Based on the entirety of the information presented above, the majority of the Project site contains low-quality suitability mountain lion habitat. Nevertheless, a mountain lion may venture on site in pursuit of its primarily prey, mule deer, given the ample amount of moderate-quality habitat present on the Project site. However, the small size of the Project site (126.5 acres) and the surrounding development and land uses greatly reduce the potential that a mountain lion would establish a territory, part of a territory, or a movement corridor on or through the Project site. These results are discussed further in Chapter 2, Supplemental Impact Analysis for Mountain Lion.

2 Supplemental Impact Analysis for Mountain Lion

At the request of CDFW, a supplemental impact analysis of potential impacts to mountain lion movement and suitable habitat was completed.

2.1 Introducing New/Additional Barriers to Movement

From a regional standpoint, the Project site is more than 6.5 miles outside of the Los Padres National Forest/Sespe Wilderness Area, north and west of the Lake Piru Recreation Area. The Project site is adjacent to existing residential development to the west and south, the 1,000,000-square-foot industrial IAC Commerce Center to the east, and an active off-road-vehicle racetrack directly to the north, with the larger communities of Castaic and Hasley Canyon farther north of the Project site (Figure 5 and Figure 6, Project Area in Context with Mountain Lion Habitat Central Coast South (CC-S) Population; Exhibit 1). From a regional perspective, I-5, approximately 2 miles east of the Project site, is a major barrier to wildlife movement, with additional wildlife connectivity restrictions from the industrial park approximately 0.2 miles east of the Project site; residential developments to the north, south, and southwest; and the Chiquita Canyon Landfill, SR-126, and the approved Newhall Ranch Specific Plan project, with the first phase of development in the Mission Village portion of Newhall Ranch currently underway, to the south. These existing and approved developments constrain wildlife from moving through the Project site from all directions except the northwest.

As indicated above, the Project site is near or directly adjacent to existing development on the north, east, and south. To the west is moderate-quality open space, but still in proximity to development (0.75 miles distance between the developments of Hasley Canyon and Val Verde). Farther west/northwest from the Project site, starting at approximately 2 miles, is natural open space and quality habitat for mountain lion movement and territory establishment; the closest mountain lion home range from the Riley et al. (2021) study starts at this location (Exhibit 2). South of the Project site, Chiquita Canyon was identified by the County of Los Angeles as a possible local movement area through a landfill, which lies south and east of Val Verde, and west of the commercial development that would provide access to the Project site. Although the Project off-site open space dedication area is near this area, the approximately 700- to 1,100-foot (0.2 miles at widest) gap between the residential and commercial developments is above the landfill with steep topography. Additionally, the existing Val Verde residential neighborhood is along Chiquita Canyon Road and borders the landfill (Exhibit 1). Reviewing the Dellinger et al. (2019) model, almost this entire area is characterized as poor suitable habitat for mountain lion, except for the habitat near SR-126 and the tops of the hills (Figure 1). The small open space area between SR-126 and the Project site contains low-quality habitat for mountain lion. In addition, the Riley et al. (2021) long-term study identified a mountain lion territory west of the Project site in the high-quality habitat area (Exhibit 2). Over the long-term study, no data points indicated that the mountain lion from the nearest established mountain lion territory, nor any other collared mountain lion, ventured onto the Project site (Exhibit 2).

The South Coast Missing Linkages: A Wildland Network for the South Coast Ecoregion study (South Coast Wildlands 2008) identified and prioritized landscape linkages widely considered to be the backbone for an open space conservation strategy for Southern California. The Project site is outside of the landscape linkages identified in this study. The Sierra Madre–Castaic Connection, shown in green in Exhibit 3, located approximately 2.3 miles north of the Project site, connects the Los Padres and Angeles National Forests. The Santa Monica–Sierra Madre

Connection, approximately 2.5 miles west of the Project site, stretches from the Santa Monica Mountains to the peaks of the Santa Susana Mountains and the Sierra Madres Ranges of the Los Padres National Forest (South Coast Wildlands 2008). As shown in Exhibit 3, Val Verde and the Project site are outside of both of these landscape linkage areas. The Project site is significantly closer to the residential and industrial development in Hasley Canyon and Castaic than these regional open space areas.

The Sierra Madre–Castaic Connection and Santa Monica–Sierra Madre Connection also show that the best-fit corridors are west of the Project site (South Coast Wildlands 2008) (Exhibit 3). Additionally, future development of the CDFW-approved Newhall Ranch Resource Management and Development Plan includes part of Chiquita Canyon (Figure 1 and Section 2.5, Cumulative Analysis); therefore, the Project site is essentially infill of a developed area, and the Project would not affect the continuous higher-quality habitat for mountain lions to the west. For these reasons, no new barriers to mountain lion movement would be introduced by development of the Project.

Given the Project site's distance from regional wildlife corridors, adjacent development on all but the northwest side of the Project site constraining wildlife movement, and little suitable habitat for mountain lion on the Project site, the Project would result in less-than-significant impacts to movement of mountain lions.

2.2 Constraining/Eliminating Essential Corridors and Pinch Points Leading to Severed Migration

Please refer to Section 2.1, Introducing New/Additional Barriers to Movement.

2.3 Habitat Loss, Fragmentation, and Encroachment

2.3.1 Habitat Loss

Chaparral vegetation was identified as important in terms of habitat use and resource selection, highlighting the importance of this habitat for the conservation of mountain lions in Southern California (Riley et al. 2021), because chaparral was the most common vegetation type used by mountain lions, at close to or greater than 50% of the time. Only 0.7 acres (less than 1%) of the Project site, including the Off-Site Improvement Area, contains chamise–black sage chaparral. Specifically, this habitat is on the site for the proposed water tank. The Project's impact on 0.7 acres of isolated chaparral would not be a significant loss of this habitat to mountain lion.

Riley et al. found that coastal sage scrub habitat accounted for 20% of mountain lion use. The Project would remove 42.8 acres of low-quality coastal scrub habitat (i.e., short, sparce, and open). Due to the open and shorter-growth vegetation associations of the coastal scrub on the Project site, the removal of 42.8 acres would not be a significant loss of this habitat to mountain lion, and is not expected to significantly impact mountain lion or its habitat (including home range or territory). Additionally, in general, the coastal scrub and chaparral vegetation on the Project site has a relatively short canopy height and is located on steep slopes. As noted in Reilly et al. (2021), adult mountain lions avoid steep slopes, especially adult females. In addition, mountain lions select areas with dense stalking cover and avoid open areas to facilitate hunting success. The Dellinger et al. (2019) model supports this conclusion (Figures 5 and 6). Regardless, using a conservative approach, the coastal scrub habitat on the Project site is considered to represent moderate-quality mountain lion habitat.

Exhibit 1. Relative Location of the Project Site (pink) and Surrounding Development

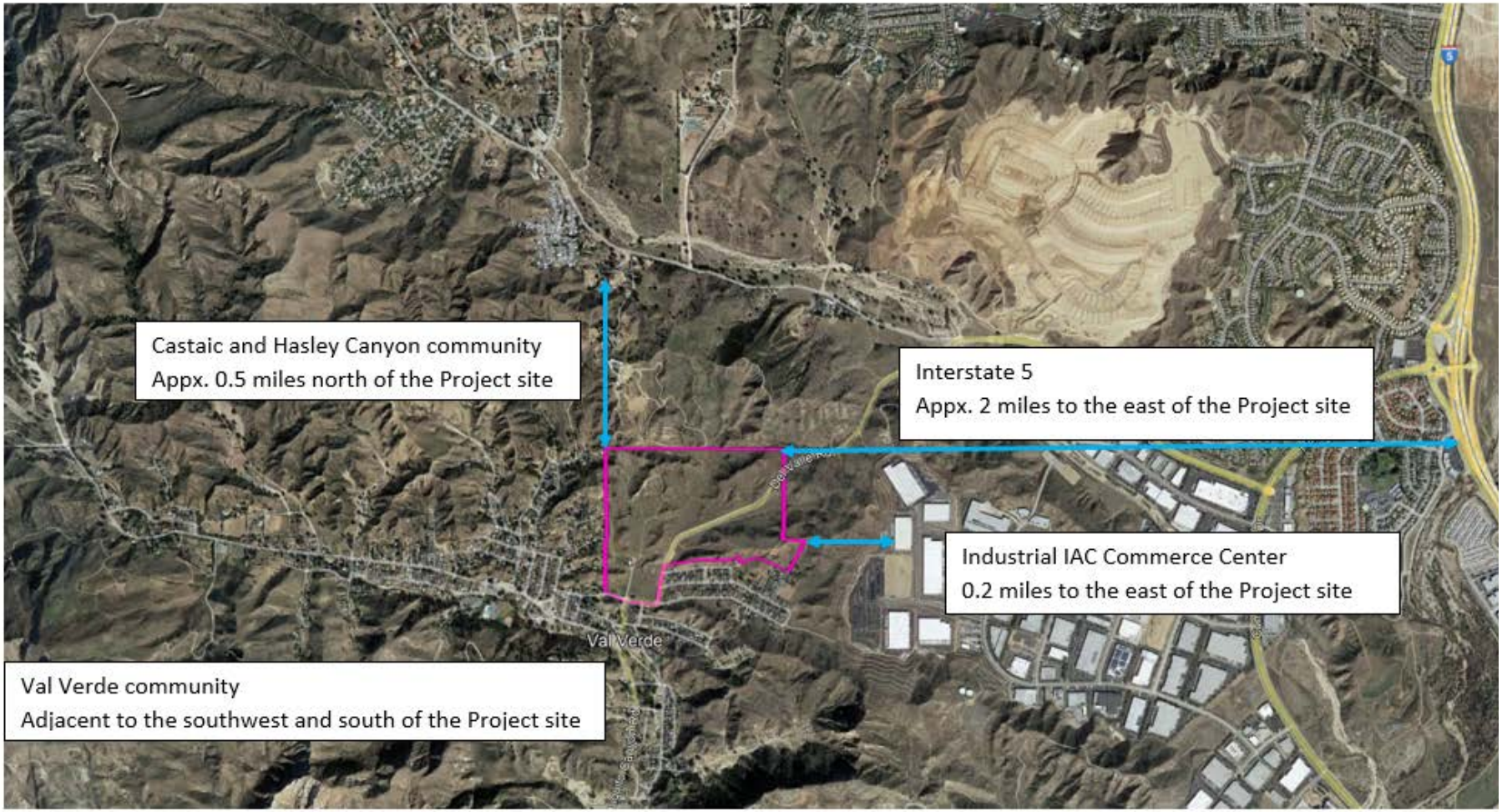


Exhibit 2. Mountain Lion Home Ranges 2002–2016 (Riley et al. 2021)

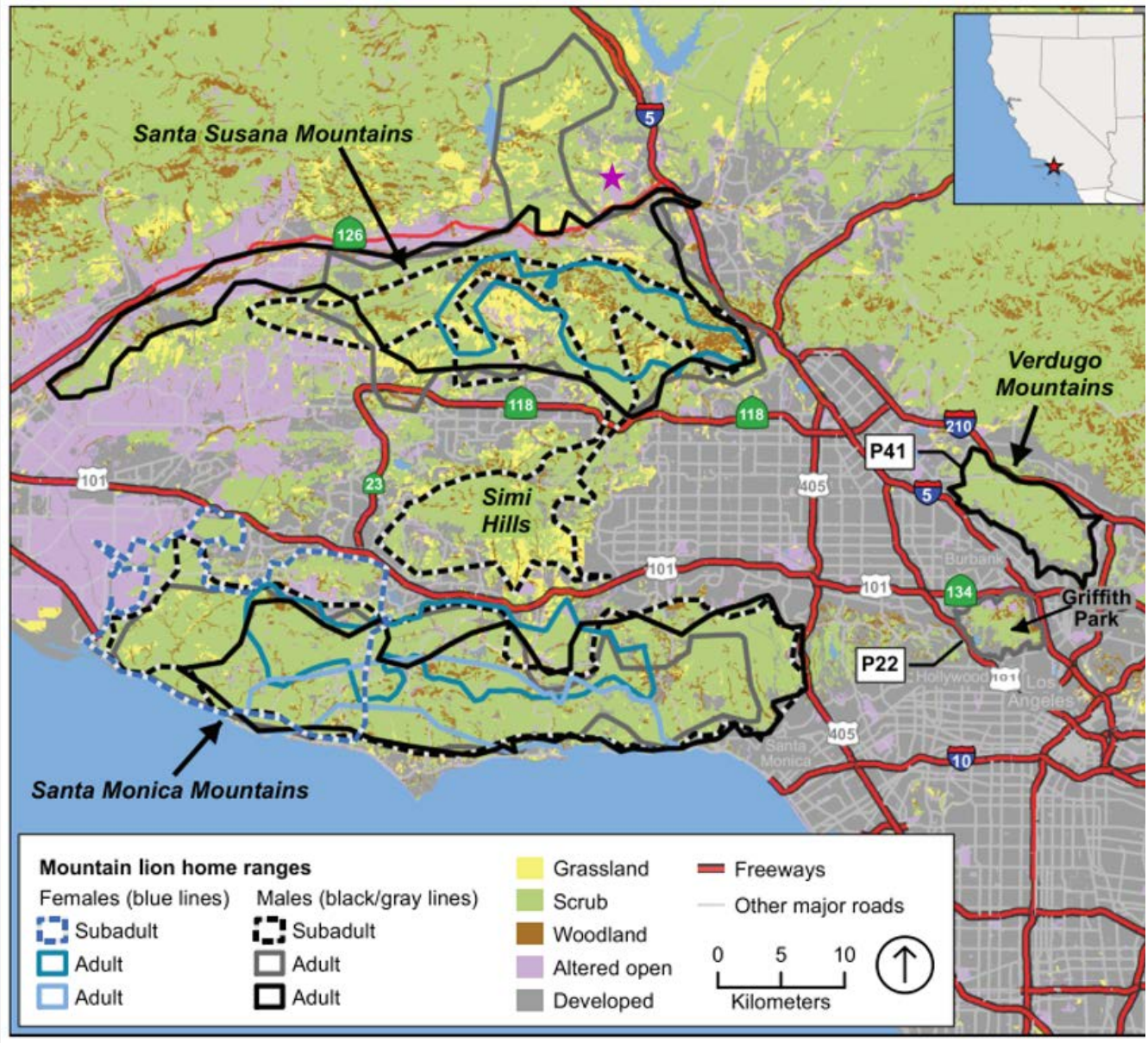
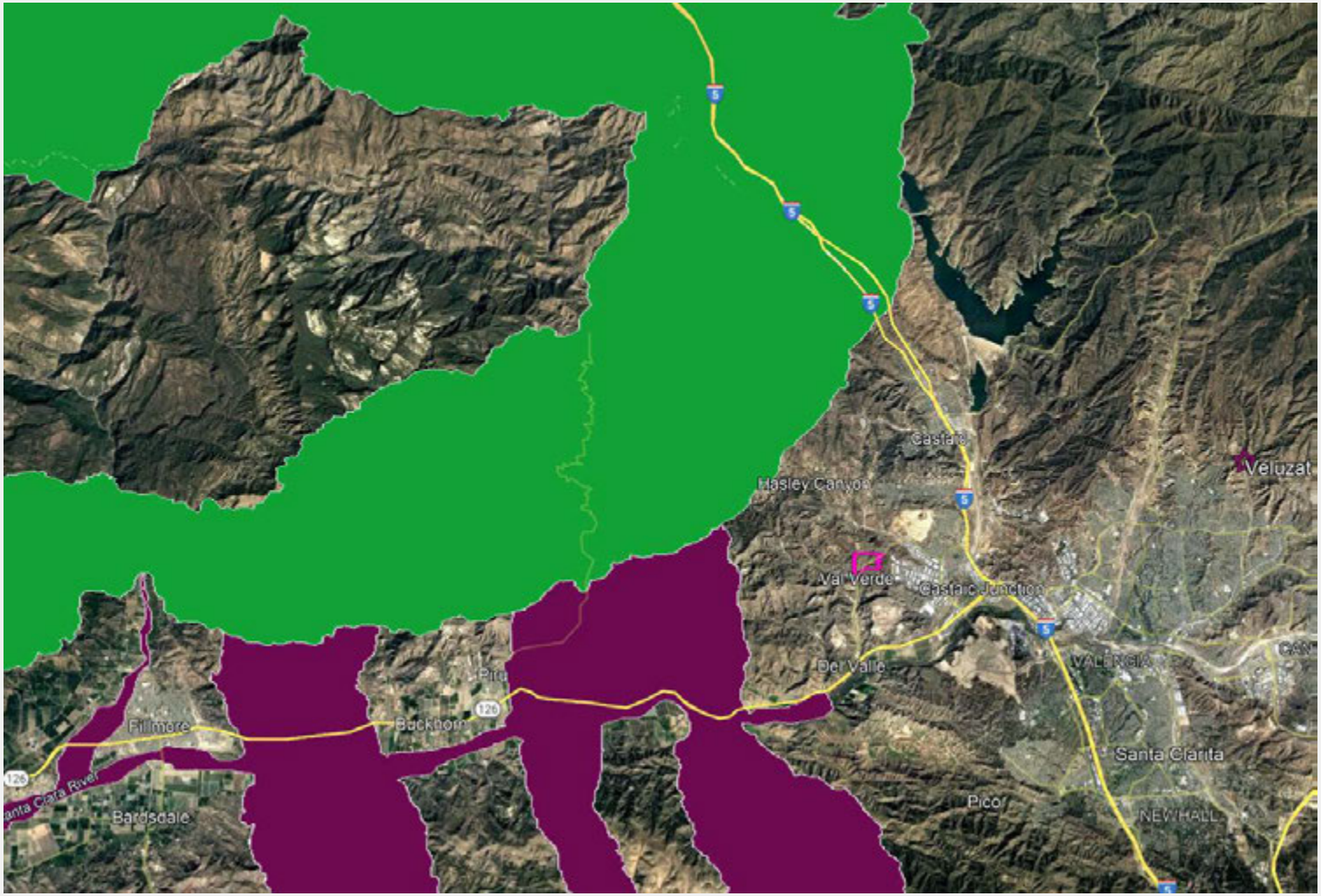


Exhibit 3. Sierra Madre–Castaic Connection (green); Santa Monica–Sierra Madre Connection (dark purple) (South Coast Wildlands 2008; Google Earth Pro 2022)



As part of an ongoing study effort from 2002 through 2019, mountain lions have been captured and radio-tracked in the Los Padres National Forest, Santa Susana Mountains, Simi Hills, Santa Monica Mountains, Verdugo Mountains, and Griffith Park, and based on this, mountain lion home ranges have been identified (Benson et al. 2020). As shown in Exhibit 2, the Project site (pink star) is outside mountain lion home ranges, which further supports that the Project site is not within key mountain lion habitat and that occupied mountain lion habitat would not be impacted.

Because the majority of the Project site contains low-quality and fragmented habitat for mountain lion, it is unlikely that a mountain lion would establish a home range or territory within the site, or even move through the site to suitable habitat to the south. For these reasons, no significant impact to mountain lion habitat (i.e., habitat loss) would occur from development of the Project.

2.3.2 Habitat Fragmentation

As described above, the Project is adjacent to existing residential and industrial development. Although there is potential for mountain lion to be present occasionally on the Project site based on areas of moderately suitable habitat on site and the presence of its primary prey item (i.e., mule deer), the Project site is adjacent to residential and industrial development on three sides and does not provide high-quality or suitable habitat for mountain lion territory establishment or movement. As indicated above, development of the Project site would essentially be infill of a complex developed area that contains primarily poor-quality habitat. Due to its location, and type and quality of habitat on the Project site, development of the Project would not fragment suitable mountain lion habitat. High-quality habitat that is occupied by mountain lion (Riley et al. 2021) occurs farther west and northwest of the Project site, south across SR-126, and east of I-5. For these reasons, the proposed Project would not result in significant impacts by fragmentating high-quality habitat suitable for mountain lion.

2.3.3 Conclusion

Due to the existing adjacent residential and industrial development near the Project site, associated existing anthropogenic disturbances, and limited prey availability, the Project site does not contain sufficient moderate- or high-quality habitat for mountain lion to establish a territory or home range. The existing coastal scrub and chaparral present on the Project site occurs in patchy areas separated by regularly maintained dirt roads and open grass and herb-dominated areas, decreasing the continuity of these key coastal scrub and chaparral vegetation communities, thereby providing poor cover habitat for mountain lions. The loss of low-quality and fragmented moderate-quality mountain lion habitat on the Project site in an area surrounded by development would not result in significant direct or indirect impacts to mountain lions.

Furthermore, regarding wildlife movement and barriers, regionally, the community of Val Verde constrains access to available habitat to the south and southwest of the Project site, which constitutes some level of existing impediment to habitat connectivity. The existing residential communities of Val Verde, Castaic, and Hasley Canyon, and the industrial park east of the Project site already significantly limit wildlife movement through the Project site. Additionally, the Dellinger et al. (2019) model suggests that the habitat in the open space area through Chiquita Canyon to the Project site consists of low-quality habitat. Wildlife barriers, specifically for mountain lion, exist south, east, and west of the Project site. Development of the Project would not create or contribute to additional barriers to mountain lion movement.

There are significant wildlife movement corridors and linkages in the region, including the Sierra Madre–Castaic Connection, which connect the Los Padres National Forest and Angeles National Forest, and the Santa Monica–Sierra Madre Connection, which stretches from the Santa Monica Mountains to the peaks of the Santa Susana Mountains and the Sierra Madres Ranges of the Los Padres National Forest (South Coast Wildlands 2008). Additionally, there are years of mountain lion radiotracking GPS data (Benson et al. 2020, Riley et al. 2021) that document mountain lion use north, west, and south of the Project site, but not on the Project site. Due to the existing development adjacent or in proximity to the Project site that already constrains wildlife movement, and the significant open space west of the Project site in the Los Padres National Forest, implementation of the Project would not interfere with mountain lion movement between large blocks of suitable natural habitat.

2.4 Increase Human Presence, Traffic, Noise, Lighting, and Introduction of Livestock or Animal Keeping

Potential indirect impacts from the Project on mountain lion as a result of increasing human presence (e.g., new development, public trail access), traffic, noise, and artificial lighting would not be significant for the reasons discussed below.

2.4.1 Human Presence

As discussed in Riley et al. (2021), the mountain lions studied were virtually never present in developed areas. Radio-tracked mountain lions retained mean distances from development that ranged from 1,280 meters (subadult males) to 1,930 meters (adult males) across the four age and sex classes (adult females, adult males, subadult females, subadult males). The distance between Hasley Canyon to the north and Val Verde to the south is roughly 1,500 meters. This existing development to the north and south reduces the suitability of the habitat on the Project site, which is already primarily low-quality habitat, for mountain lions, and the potential for the Project to create additional human-induced impacts. Per Riley et al. (2021), all age and sex classes of mountain lions avoided altered open areas, with males avoiding these areas most strongly. The Project site, while currently undeveloped, is surrounded by existing urban development, and this is likely one of the reasons why no mountain lions (or sign) were observed during the study or during extensive field surveys conducted on the Project site.

The Project site is situated adjacent to existing residential and industrial development on three sides, which currently generates artificial outdoor residential and industrial lighting and noise. In addition, Del Valle Road is an existing road that bisects the Project site. The DEIR for the Project acknowledges that although the Project is adjacent to existing development, there is the potential for anthropogenic impacts on mountain lions. To address potential impacts to mountain lions from increased human presence, several mitigation measures are included in the DEIR to reduce impacts, as described below (Meridian Consultants 2021).

MM 5.3-14 Homeowner Association Covenants, Conditions & Restrictions. Prior to the issuance of grading permits, the Project Developer shall submit the homeowner association (HOA) Covenants, Conditions & Restrictions to the County of Los Angeles Department of Regional Planning for review and approval. The homeowner association Covenants, Conditions & Restrictions shall include the following requirements to reduce potential human impacts on adjacent habitats and wildlife species:

- All dogs and cats shall be in compliance with requirements found in Sections 10.20.150 through 10.20.350 of the Los Angeles County Code related to appropriate licensing and

tagging, leashed animals when appropriate, ensuring that all dogs and cats are neutered or spayed (or an unaltered license in accordance with Los Angeles County Code), and that all dogs and cats have a microchip.

- Smoking shall be prohibited in open space areas.
- Speed limits shall be posted, and the Covenants, Conditions & Restrictions shall require residents to comply with the posted speed limits.
- Balloons shall not be utilized by the homeowner association for any community events and the use of balloons by individual homeowners shall be discouraged.
- Homeowner reprisals against native wildlife species (i.e., killing or harming native wildlife species in any way) if homeowner pets are killed or harmed by wildlife shall be prohibited.
- Second-generation anticoagulant rodenticide use shall be prohibited.

MM 5.3-23 Pet Signage. Prior to Project completion, the Project Applicant shall install signage requiring pets be kept on leash and on trails at all times. Signage shall also include information signage for hikers encouraging clean up after pets and discourage animal waste.

MM 5.3-24 Wildlife Signage. Prior to Project completion, the Project Applicant shall install appropriate public information signage in the residential area and along the trail to 1) educate and inform the public about wildlife, especially mountain lions, present in the area; 2) advise on proper avoidance measures to reduce human-wildlife conflicts; 3) advise on proper use of open space trails in a manner respectful to wildlife; and 4) provide local contact information to report injured or dead wildlife. Signage shall be written in the language(s) understandable to all those likely to recreate and use the trails. Signage shall not be made of materials harmful to wildlife such as spikes or glass. In addition, the Project Application shall prepare a long-term maintenance plan to repair and replace the signs.

Indirect impacts are further discussed below.

2.4.2 Traffic

As detailed in DEIR Section 5.15, mitigation measures are identified to avoid and minimize indirect impacts from improvements to the existing roads in the vicinity of the Project site. Mitigation Measure (MM) 5.15-3 requires the incorporation of traffic-calming measures, such as marked crosswalks, at appropriate locations within and near the Project site. Currently, the intersection of Del Valle Road and Hasley Canyon Road is controlled by one stop sign on northbound Del Valle Road merging onto Hasley Canyon Road. Roadways would be designed to decrease motor vehicle speeds and reduce traffic volume using features that may include marked crosswalks, curb extensions, speed tables, raised crosswalks, raised intersections, median islands, tight corner radii, on-street parking, planter strips with street trees, chicanes/chokers, and other measures. The selection of specific traffic-calming treatments would occur as part of the roadway's final design process, with a specific focus on reducing vehicular speed, resulting in safer conditions for residents and wildlife.

With implementation of MM 5.15-4, the Project developer will be required to pay applicable fees to the County of Los Angeles to ensure that a fair-share contribution is made to the County for traffic improvements, including installation of a traffic signal at the intersection of Del Valle Road and Hasley Canyon Road, at the time building permits are issued. Additionally, through MM 5.15-9, the Project developer will be required to pay applicable fees

to the County/California Department of Transportation (Caltrans) to ensure a fair-share contribution for a traffic signal at the intersection of Chiquito Canyon Road and SR-126 (improvements identified in the Caltrans SR-126 project study report). Installation of these signals will result in additional traffic controls that will reduce travel speeds and the potential hazards to residents and wildlife on and near the Project site.

The current design of Del Valle Road includes sharp increases in topographical elevation and limited visibility along the VTTM site. Through implementation of the Project, Del Valle Road would continue to provide one lane in each direction, with Del Valle Road widened to approximately 64 feet within approximately 80 feet of right-of-way to meet current County standards for a Limited Secondary Highway, increasing the visibility and safety of this public road. Road improvements include improving the transition in elevations on the road, which will increase visibility on the road and adjacent areas. Upon completion, the additional right-of-way would provide for increased vehicular movement during an emergency, and would provide for additional surface area to potentially incorporate drainage-control features. Internal roadways would be designed for one lane in each direction within approximately 58 feet of right-of-way. A bus stop would be relocated but continue to be provided along Del Valle Road.

With the addition of the mitigation measure for traffic, the Project is not only safer for pedestrians and commuters, but also for mountain lions that would transverse Del Valle Road. Most important is the traffic-calming measures and increasing visibility along Del Valle Road near the Project site.

2.4.3 Noise

Noise from Project construction activities would be affected by the amount of construction equipment, the location of this equipment, the timing and duration of construction activities, and the relative distance to noise-sensitive receptors. Construction activities would generate both steady-state and episodic noise that would be heard both on and off the Project site. Each Project phase would involve the use of different types of construction equipment and, therefore, would have its own distinct noise characteristics. The Project would be constructed using typical construction techniques; no blasting or impact pile-driving would be required. As required by the County Noise Ordinance, the operation of Project-related construction equipment would be prohibited between 7:00 p.m. and 7:00 a.m., and anytime on Sundays and legal holidays. The DEIR includes MM 5.11-1, which requires a construction noise monitoring plan, ensuring that equipment is staged away from sensitive receptors, properly muffled, scheduled to avoid the operation of numerous pieces of heavy-duty off-road construction equipment simultaneously in close proximity, and the use of temporary noise barriers, to reduce potentially significant noise impacts from Project construction (Meridian Consultants 2021).

During construction, the MM 5.11-1 would reduce the possibility of higher-level decibels and uneven frequencies occurring during times a mountain lion is most like to hunt (i.e., dusk to dawn). Ambient noise from the constructed Project is not likely to reach the nearest mountain lion home range over 2 miles to the west/northwest. Because the Project site and surrounding area are primarily low-quality habitat, and because of implementation of MM 5.11-1, the noise from construction and even ambient neighborhood noise post-construction are unlikely to affect mountain lions.

2.4.4 Lighting

Lighting can have well-documented indirect effects on wildlife, including the following: disorientation; avoidance of areas; disturbances of nighttime rest and sleep periods of diurnal birds; simulated increased day length, affecting

reproductive cycles by triggering premature reproductive activity; and increased risk of predation. The Project would comply with the County Rural Outdoor Lighting District Ordinance, which regulates outdoor lighting to promote and maintain dark skies at night for residents and wildlife. As required by the Rural Outdoor Lighting District Ordinance and the Castaic Area Community Standards District regulations, the Project would include fewer streetlights than typical lighting associated with single-family homes and a small commercial center. Exterior lighting would be low-intensity, directed toward the surface of on-site roadways and walkways, and/or fully shielded to prevent glare or direct illumination toward the nighttime sky or within the natural undisturbed open space area. Internal street lighting would only be permitted where required by the County Department of Public Works. The proposed commercial uses would include lighting that would be downcast luminaires with light patterns along the buildings to provide adequate illumination for safety. This would include that all lighting along the perimeter of natural areas be downcast luminaries with light patterns directed away from natural areas.

The DEIR includes MM 5.3-16, Lighting (Meridian Consultants 2021): "All lighting along the perimeter of natural areas shall be downcast luminaries with light patterns directed away from natural areas." With implementation of this mitigation measure, the Project would have a less-than-significant impact on mountain lions.

2.4.5 Increased Fire Risk

As recognized in the DEIR, urbanization also alters wildfire regimes as a result of human activities at the open space–urban interface, such as accidental ignitions from sparks from equipment such as mowers striking rocks, cigarettes, children playing with matches, and intentional ignitions such as arson. While wildfires are most likely to be ignited in edge areas, the actual effect of large wildfires can occur at the much broader landscape level, especially when fires are quickly spread into undeveloped lands by strong winds.

To offset the risk of wildlife, the DEIR includes MM 5.3-5: Landscaping Plan which requires that all residential plantings shall be in accordance with the County of Los Angeles Fire Department Fuel Modification Guidelines (Los Angeles County Fire Department 2011). This would create a 200-foot buffer area between open space and structures to provide a defensible space for fire suppression forces, slow the rate of spread, and reduce flame lengths and intensities of fires prior to reaching irrigated areas. And, MM 5.3-6 Fire Protection Plan, which prior to the issuance of grading permits, the Project Developer shall prepare a Fire Protection Plan (FPP) that meets County Fire Department requirements and submit the FPP to the County of Los Angeles Department of Regional Planning for review and approval.

With implementation of these mitigation measures, the Project would have a less-than-significant impact on mountain lion habitat on the Project site and offsite areas.

2.4.6 Use of Herbicides, Pesticides, Rodenticides

The DEIR includes MM 5.3-14, Homeowner Association Covenants, Conditions & Restrictions, which prohibits homeowners from using second-generation anticoagulant rodenticides or from harming or killing wildlife. Additionally, MM 5.3-23 require that pets remain on a leash, and MM 5.3-24 provides educational signage for native wildlife, including reducing human-introduced dangers such as spikes and glass (Meridian Consultants 2021).

Please refer to MM 5.3-14 in Section 2.1.4.1 of the DIER (Meridian Consultants 2021) for details on pesticide and rodenticides use. MM 5.3-23 and MM 5.3-24 are also provided in this DEIR section.

2.4.7 Livestock or Animal Keeping

No livestock or animal keeping beyond common residential pets are planned for the Project. Please refer to MM 5.3-14 in the DEIR for Homeowner Association Covenants, Conditions & Restrictions addressing domestic animals.

2.5 Cumulative Analysis

To understand the potential cumulative impacts to mountain lion, a 10-mile radius around the Project site was evaluated. As described in the DEIR, current and probable future related projects within this 10-mile radius that might be developed or under construction within the same timeframe as the Project were identified (Meridian Consultants 2021). In summary, these related projects are expected to develop approximately 13,422 single-family residential units, 11,462 multifamily residential units, 95 adult age-qualified residential units, and 7,446,000 square feet of commercial units. The majority of these projects are along the I-5 Castaic to Santa Clarita corridor near existing development in Castaic (High School), Hasley Canyon (residential), Newhall Ranch (residential and commercial), Val Verde (residential), and a plethora of small projects, infill, or an extension of the developed area. The largest of these projects is Newhall Ranch.

As discussed with CEFW and the County, the application for Tract Map No. 62000 on property owned by the Project applicant near the Project site has not been deemed complete, and that project is not currently being pursued. If and when Tract Map No. 62000 is pursued, it would be subject to the current stringent development standards, which would decrease the portion of this property available for development in comparison to Tract Map No. 62000 as originally proposed. Therefore, Tract Map No. 62000 is not considered a probable future project and is not in the cumulative analysis.

Using the Dellinger et al. (2019) model, the habitat suitability for mountain lions in the vicinity was reviewed. The majority of current and future projects identified are in the area west of I-5. I-5 is a barrier to mountain lion movement (Table 2). Essentially, development of the proposed Project would not impact good-quality habitat for mountain lion; however, 14.23 acres (or 0.0009%) of moderate-quality habitat would be converted to residential uses in an area currently composed of an assortment of urban uses. The Project would impact a higher percentage of poor-quality habitat, or 0.155% of the Project site. No good-quality mountain lion habitat would be impacted by development of the Project.

Cumulatively, development of a 126.5-acre residential project near I-5, the Cities of Santa Clarita and Castaic, and the communities of Val Verde and Hasley Canyon would reduce poor-quality habitat in an urban landscape not suited for mountain lion home range establishment or safe movement. However, due to the size and location of the Project site, the Project would have a cumulatively considerable contribution to significant cumulative impact on mountain lion movement in the region. Therefore, the following mitigation measure should be incorporated into the final EIR.

In formulating mitigation measures that reflect the degree of the Project's impacts, we considered the location of the site in relation to open space and developed areas, the habitat quality and quantity and movement potential on the Project site, the undeveloped natural lands remaining on Vesting Tentative Tract No. 60257, the proposed off-site conservation easement, and the proposed trail system[1]. The Project will impact 101.3 acres of poor quality mountain lion movement habitat per Dellinger et. al. (2019), Riley et. al. (2021), and Dudek (2021 and 2022). Since 12.6 acres of Natural Open Space along the boundary of the development will remain on the Project site,

37.9 acres of off-site land of similar habitat and movement potential will be placed in a Conservation Easement, and a 0.36-acre public trail will help retain a north-south connection for mountain lion movement through Chiquita Canyon, 50.4 acres of Project impacts would require mitigation for the Project's contribution to the cumulative impact. All of the mitigation options discussed below address areas with higher quality habitat located in areas more critical to successful mountain lion movement and genetics in the region. For this reason, a 1:2 mitigation (Mitigation: Impact) is proposed as appropriate. The mitigation options presented below were discussed with Caltrans Senior District 7 Biologist Paul Caron, NPS's mountain lion expert Jeff Sikich, and the County, more recently, and all were supportive of the overall mitigation strategy.

Mitigation Measure

MM-BIO-5.3-X Prior to issuance of a grading permit, to mitigate the contribution of the Project to a regional cumulative impact on mountain lion movement: (1) the subdivider shall establish a Conservation Easement over the 37.9-acre Off-Site Open Space Dedication Area and a Conservation Plan prepared and implemented to preserve coastal scrub habitat in the Off-Site Open Space Dedication Area and a 0.36-acre public trail as illustrated on Vesting Tentative Tract Map No. 60257 shall be maintained in perpetuity to maintain movement opportunities for mountain lions between Chiquita Canyon and the Los Padres National Forest (please refer to MM 5.3-1); and (2) subdivider shall purchase an off-site conservation easement, to be held by a public agency or non-profit conservation planning organization, (a) covering at least 50 acres of equivalent habitat or (b) a smaller area if the following can be demonstrated: (i) within a known mountain lion corridor, or (ii) containing a riparian habitat and adjacent to a known mountain lion corridor, or (iii) within a known or modeled mountain lion movement corridor located in western Los Angeles County or eastern Ventura County, north of State Route-126 and south of the Los Padres National Forest. The conservation easement shall be recorded prior to grading permit issuance. The final size and location of the conservation easement shall be to the satisfaction of the director.

3 References

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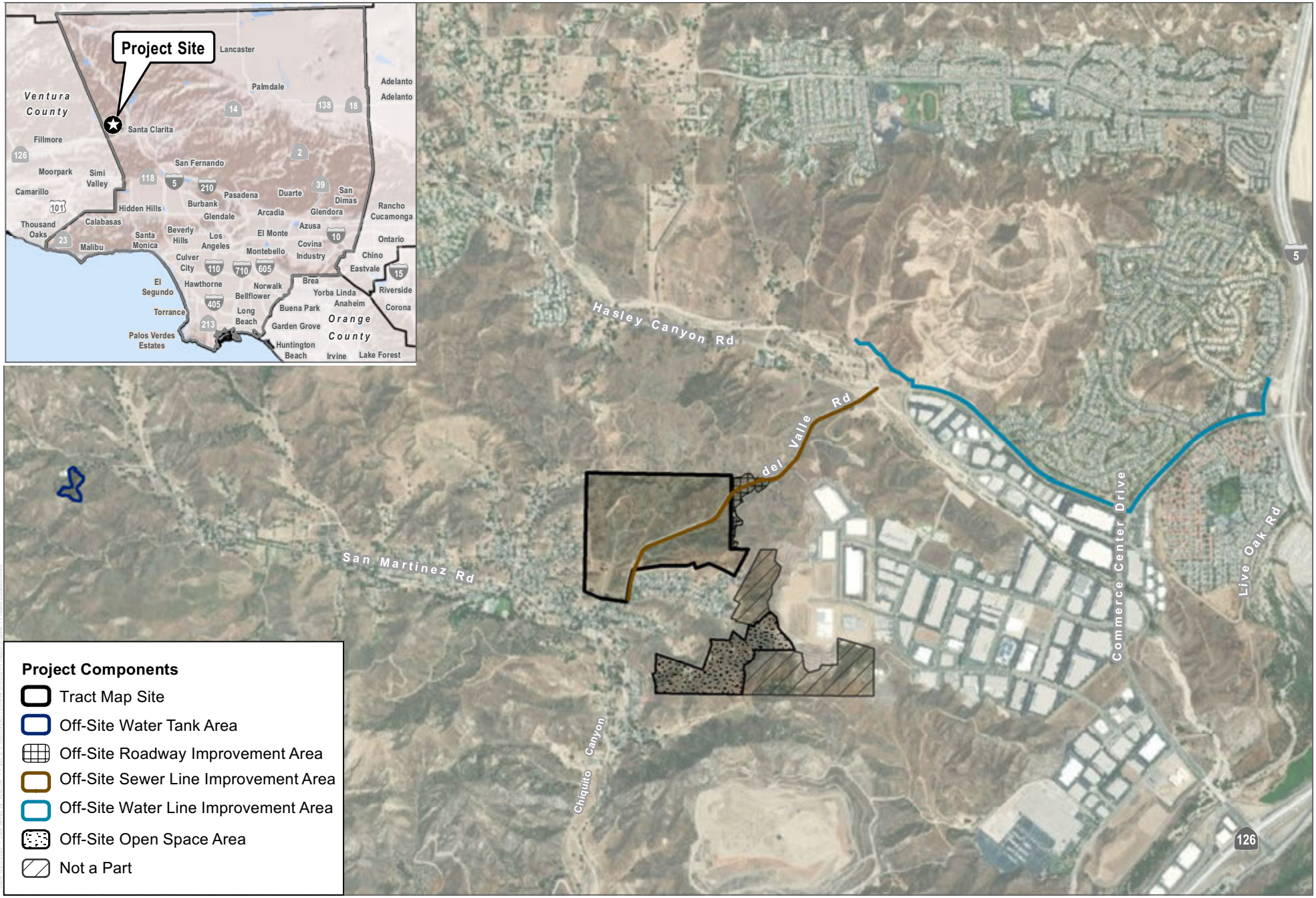

SOURCE: DigitalGlobe 2017

DUDEK

0 1,000 2,000 Feet

FIGURE 1

Project Location

Biological Technical Report for the Sterling Ranch Estates Residential Project

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SOURCE: USGS

DUDEK

0 21,000 42,000 Feet

FIGURE 2

Project Region

Sterling Ranch Estates Project

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Biological Survey Area

Project Components

- Tract Map Site
- Off-Site Roadway Improvement Area
- Off-Site Sewer Line Improvement Area
- Off-Site Open Space Area
- Not a Part

Vegetation Communities and Land Cover Types

Grass and Herb Dominated

BN-BD = Brassica nigra - Bromus diandrus Semi-natural Association

BRDI = Bromus diandrus Semi-natural Association

WOABG = Wild oats and annual brome grasslands *(Avena spp. - Bromus spp.)* Semi-Natural Alliance

Riparian

AWT = Arroyo willow thickets *(Salix lasiolepis)* Alliance

MFT = Mulefat thickets *(Baccharis salicifolia)* Alliance

RT = Rhus trilobata Association

Scrub

CBS = California buckwheat scrub *(Eriogonum fasciculatum)* Alliance

CSB-CB = California sagebrush - California buckwheat scrub *(Artemisia californica - Eriogonum fasciculatum)* Alliance

CSS = California sagebrush scrub *(Artemisia californica)* Alliance

CYS = Coyote brush scrub *(Baccharis pilularis)* Alliance

PGBS = Palmer's goldenbush scrub *(Ericameria palmeri)* Provisional Alliance

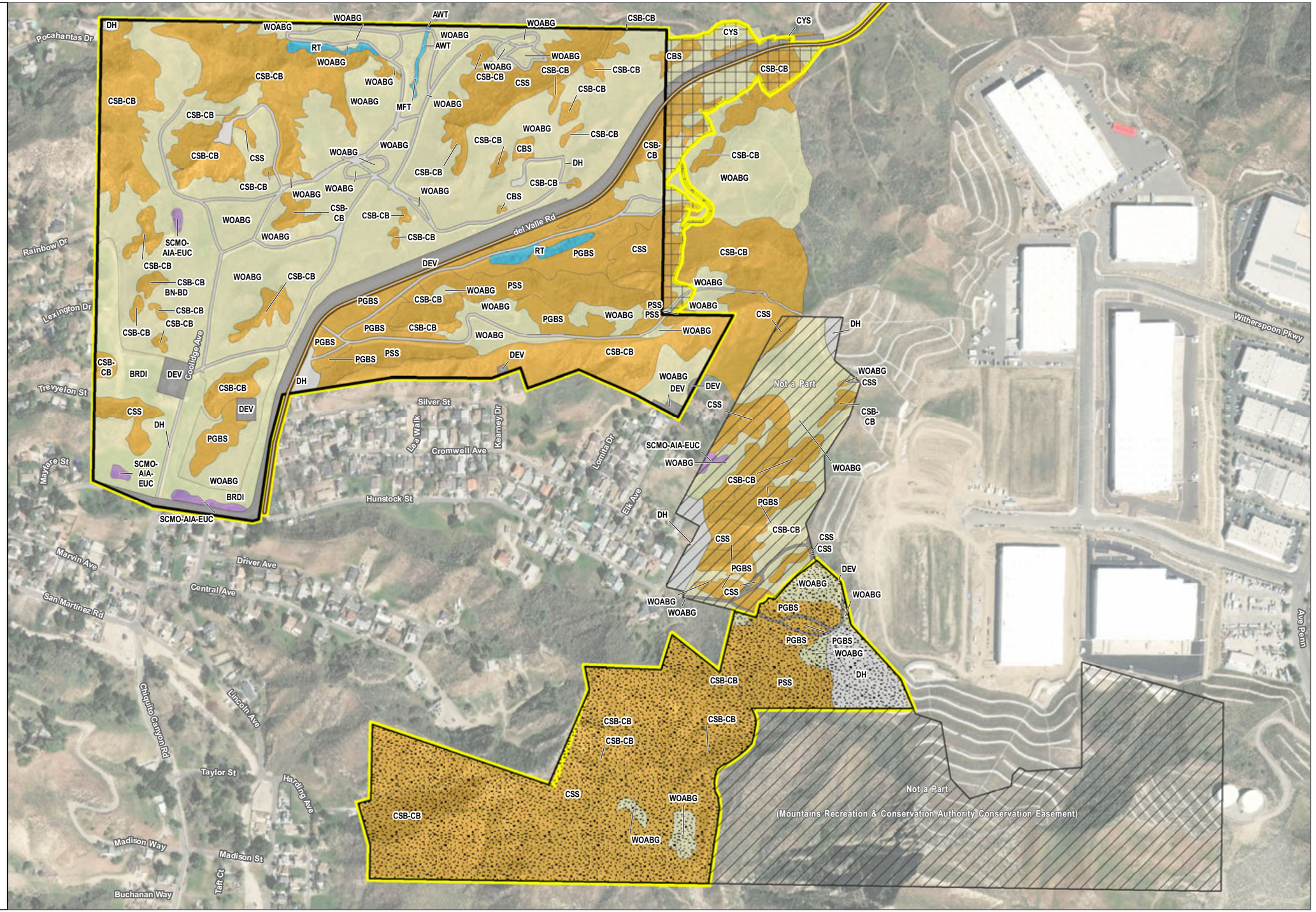
PSS = Purple sage scrub *(Salvia leucophylla)* Alliance

Other

SCMO-AIA-EUC = Schinus molle Association - Ailanthus altissima Semi-natural Association - Eucalyptus *(globulus, camaldulensis)* Provisional Semi-natural Association

DEV = Urban/Developed

DH = Disturbed Habitat



SOURCE: Eagle Aerial Solutions 2018

DUDEK

0 255 510 Feet

FIGURE 3A

Track Map Site, Off-Site Roadway Improvement Area, and Off-Site Open Space Area Vegetation Communities and Land Cover Types

Biological Technical Report for the Sterling Ranch Estates Residential Project

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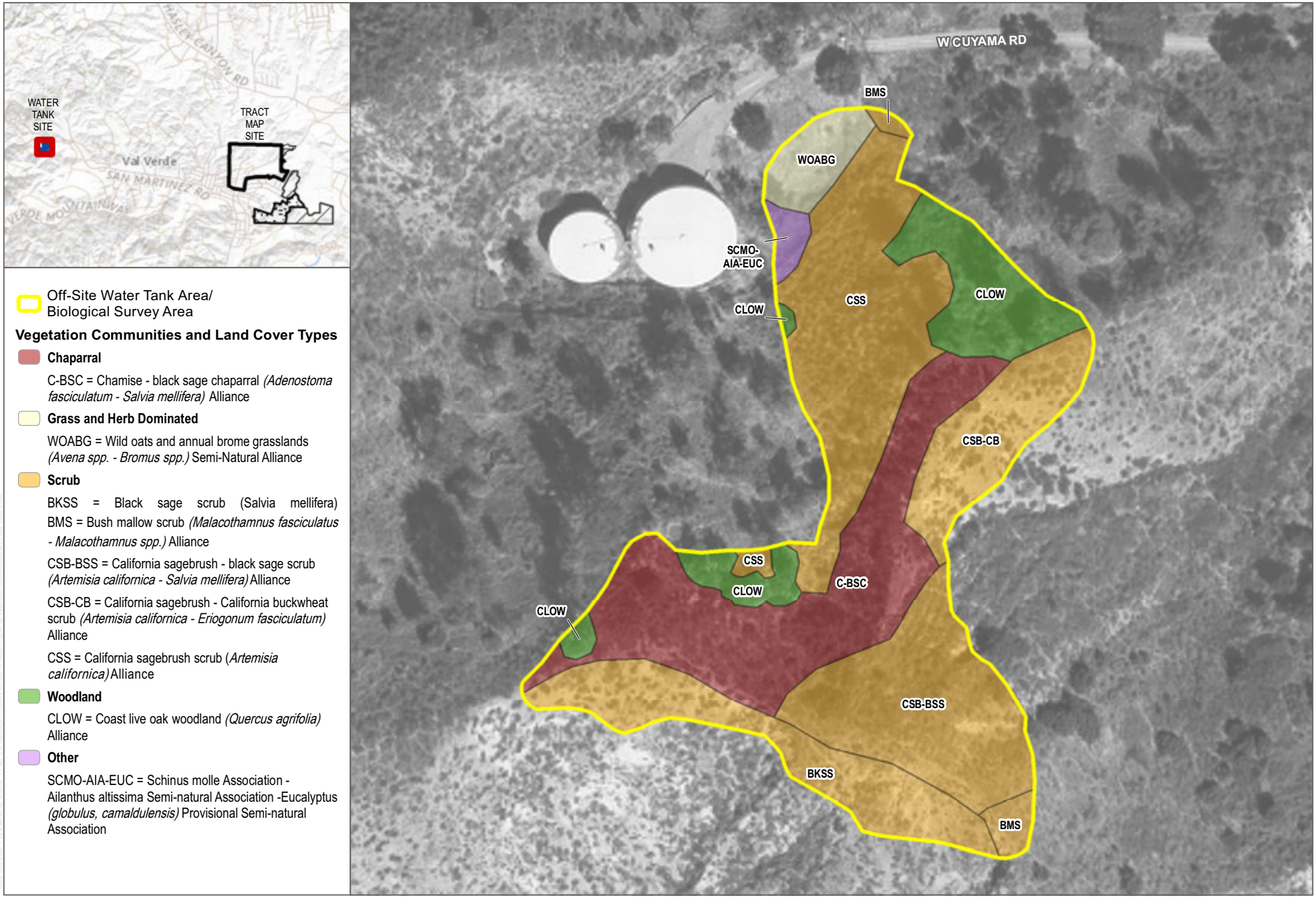

SOURCE: Eagle Aerial Solutions 2018

DUDEK

0 50 100 Feet

FIGURE 3B

Off-Site Water Tank Area Vegetation Communities and Land Cover Types

Biological Technical Report for the Sterling Ranch Estates Residential Project

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Biological Survey Area

Project Components

Tract Map Site

Off-Site Roadway Improvement Area

Off-Site Sewer Line Improvement Area

Off-Site Water Line Improvement Area

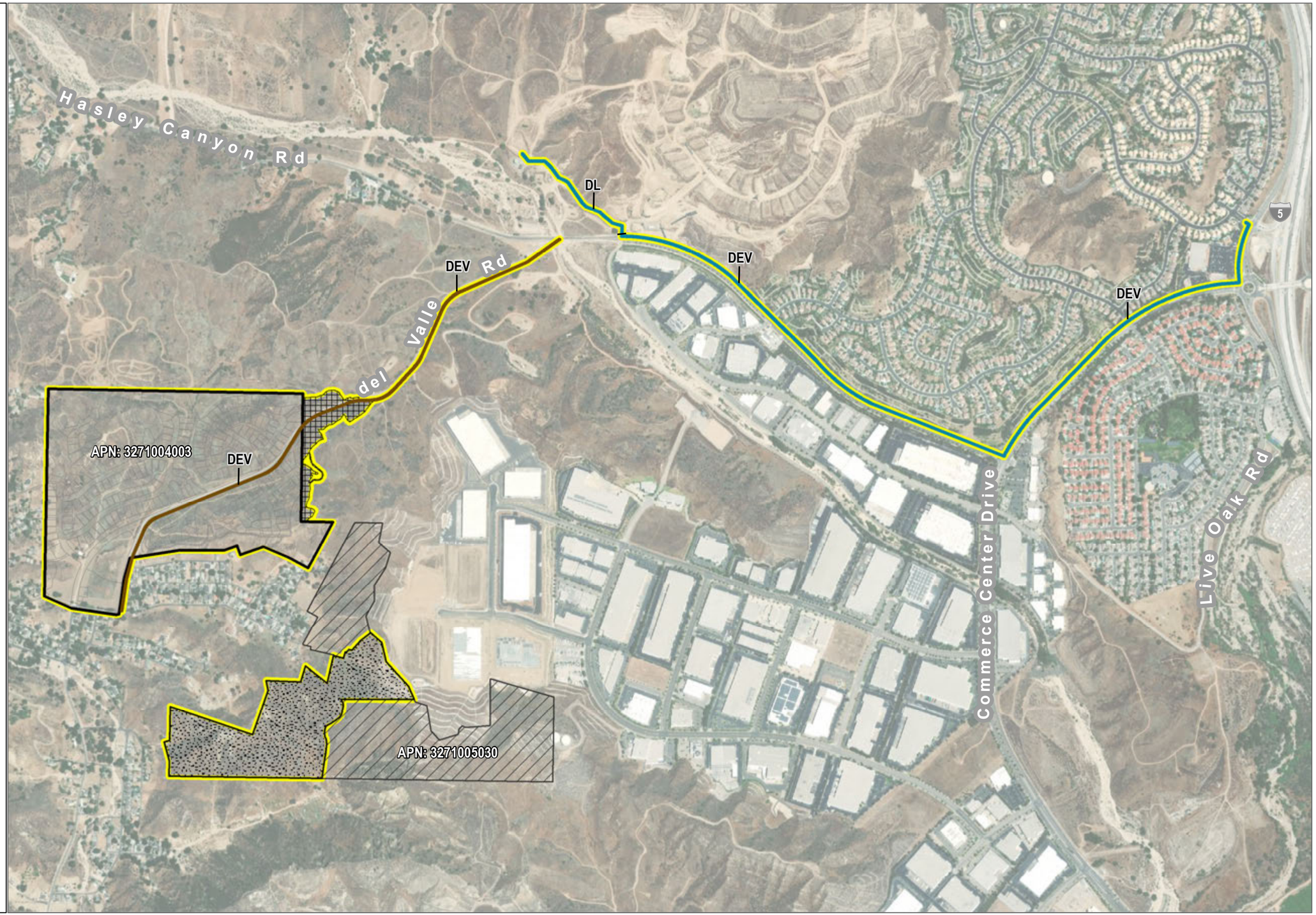
Off-Site Open Space Area

Not a Part

Vegetation Communities and Land Cover Types

DEV = Urban/Developed

DH = Disturbed Habitat



SOURCE: Eagle Aerial Solutions 2018

DUDEK

0 500 1,000 Feet

FIGURE 3C

Off-Site Water Line Improvement Area and Off-Site Sewer Line Improvement Area Vegetation Communities and Land Cover Types

Biological Technical Report for the Sterling Ranch Estates Residential Project

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Sterling Ranch Estates Project Site Components

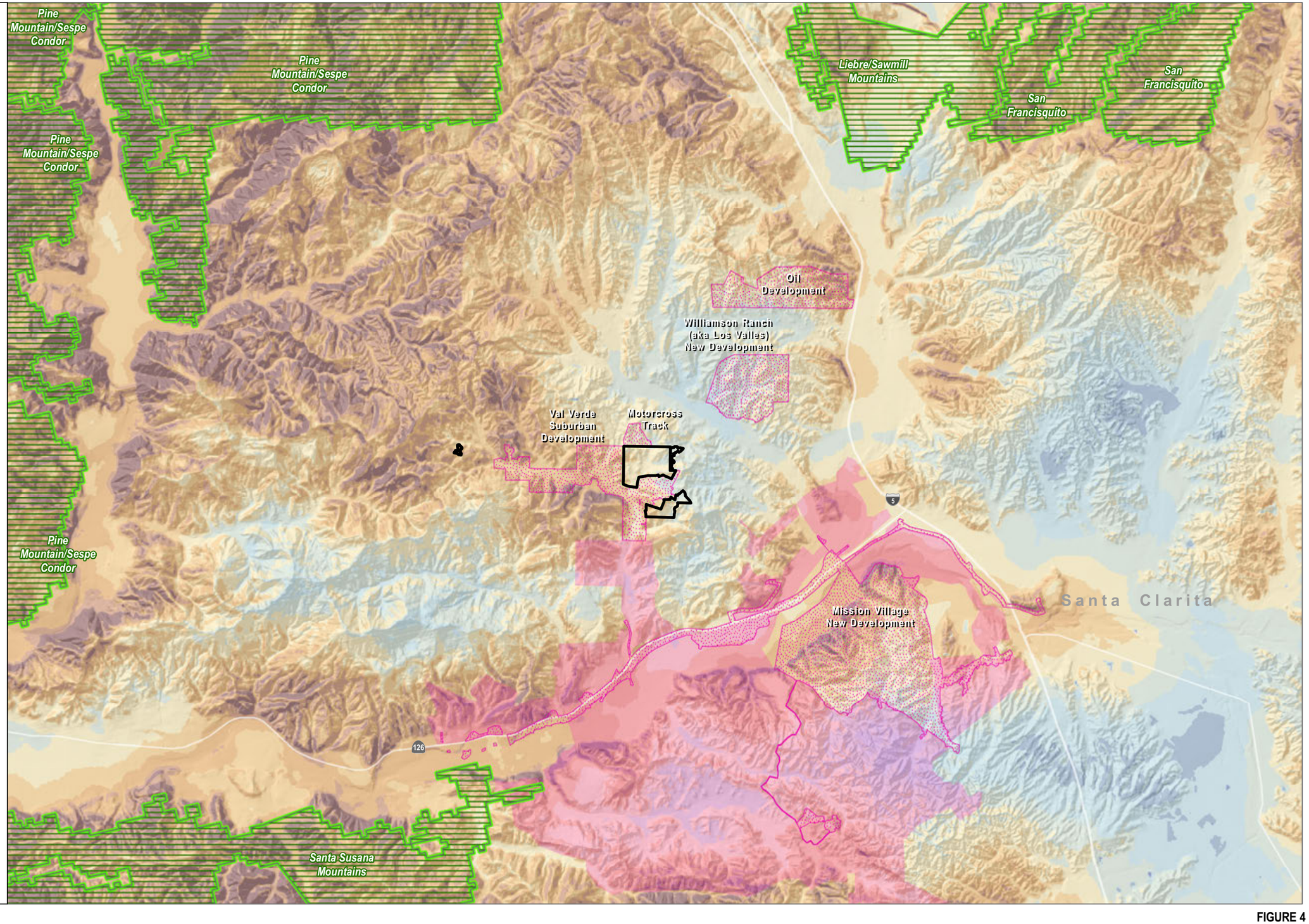
Other low habitat suitablity areas

Proposed Future Newhall Ranch Development

Natural Landscape Blocks

Mountain Lion Habitat Suitability

- 10 (High)
- 9
- 8
- 7
- 6
- 5
- 4
- 3
- 2
- 1 (Low)



SOURCE: CDFW Bios Datasets ds2916, ds621

DUDEK 0 0.5 1 Miles

FIGURE 4

Mountain Lion Habitat Suitability within the Vicinity of Project Site

Sterling Ranch Estates Project

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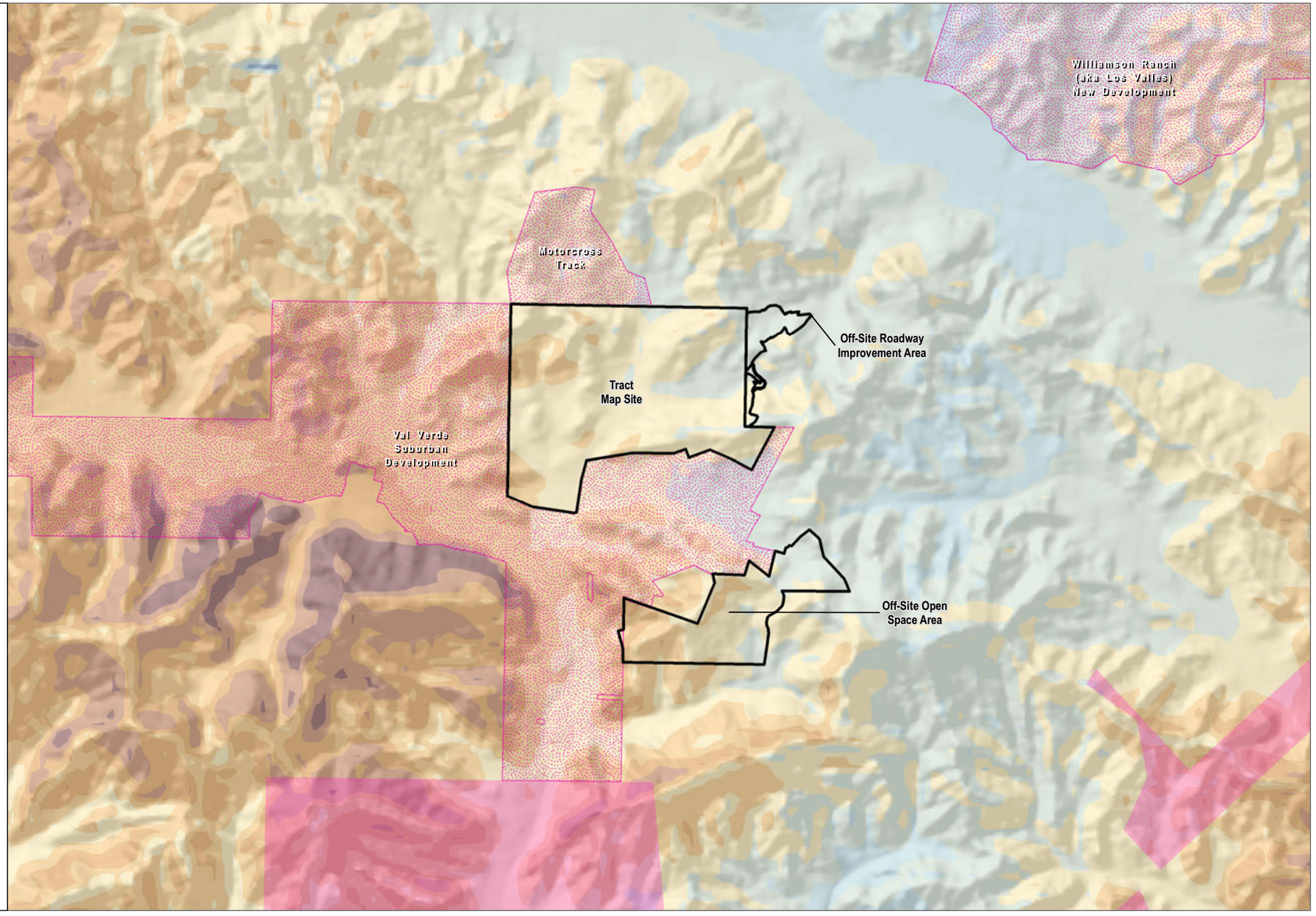
Sterling Ranch Estates Project Site Components

Other low habitat suitability areas

Proposed Future Newhall Ranch Development

Mountain Lion Habitat Suitability

- 10 (High)
- 9
- 8
- 7
- 6
- 5
- 4
- 3
- 2
- 1 (Low)



SOURCE: CDFW Bios Datasets ds2916, ds621

DUDEK

0 0.1 0.2 Miles

FIGURE 5

Mountain Lion Habitat Suitability in Project Areas

Sterling Ranch Estates Project

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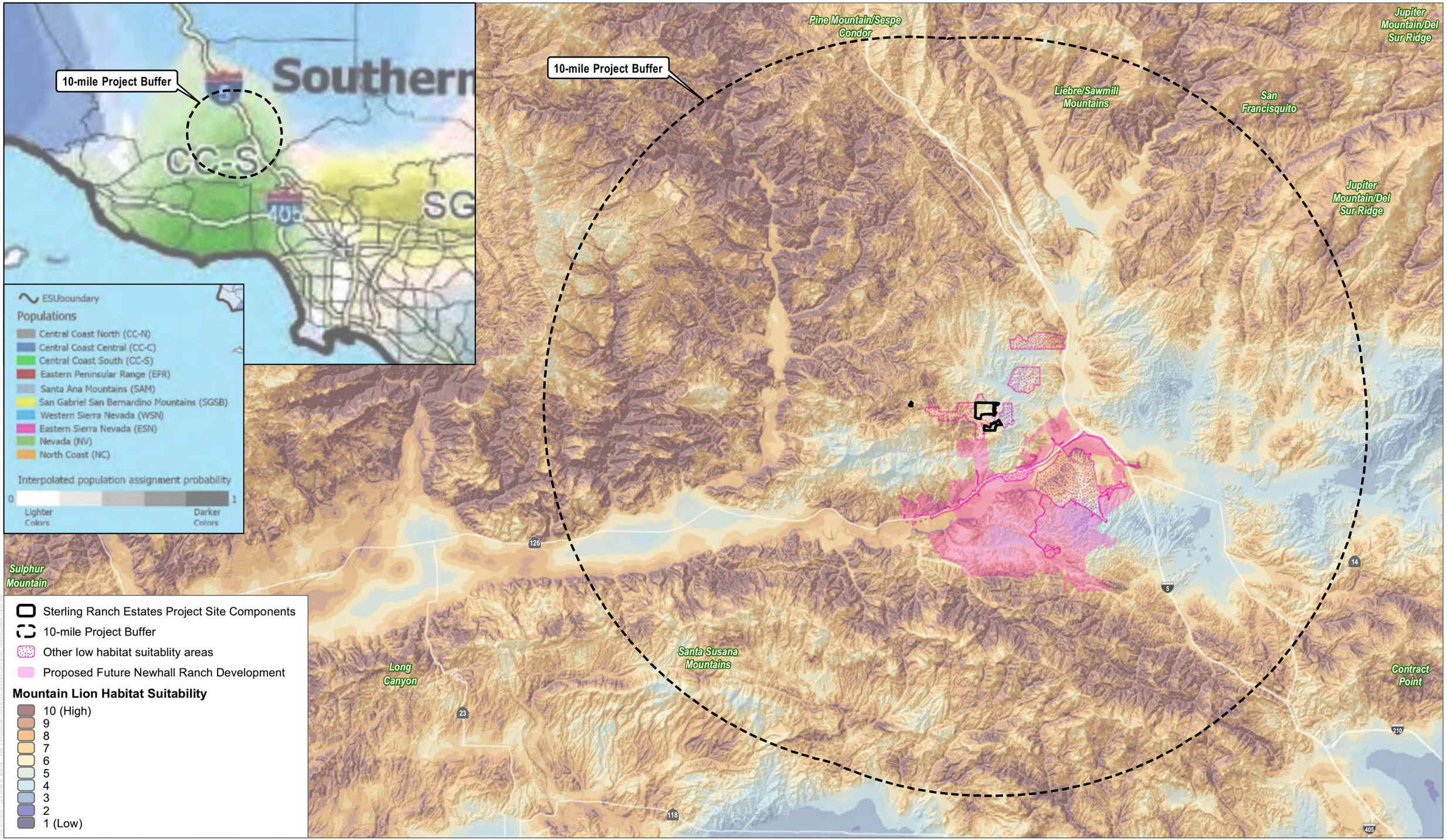

SOURCE: CDFW Bios Datasets ds2916, ds621, Item 7 Mountain Lion Consent

DUDEK

0 1.25 2.5 Miles

FIGURE 6

Project Area in Context with Mountain Lion Habitat Central Coast South (CC-S) Population

Sterling Ranch Estates Project

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APPENDIX B.2

Slender Mariposa Lily Memorandum

DUDEK
621 CHAPALA STREET
SANTA BARBARA, CALIFORNIA 93101
T 805.963.0651 F 805.963.2074

MEMORANDUM

To:	Ruby Kwan-Davis, California Department of Fish and Wildlife
From:	John H. Davis IV, Dudek
Subject:	Revised - Evaluation of the Likelihood of Success for Proposed Slender Mariposa Lily Mitigation for the Sterling Ranch Estates Residential Project
Date:	January 17, 2023
cc:	Erinn Wilson-Olgin, California Department of Fish and Wildlife Hunt Williams, Partner, Sterling Ranch Estates Joe Decruyenaere, County of Los Angeles Department of Regional Planning Kathleen Truman, Truman & Elliott LLP Victoria Tang, California Department of Fish and Wildlife
Attachments:	Figure 1 – Project Location Figure 2 – Off-Site Open Space Dedication Area – Slender Mariposa Lily Locations and Suitable Habitat

As we discussed on June 14, 2022, this memorandum was prepared to provide an evaluation of the proposed mitigation areas and likelihood of success for proposed slender mariposa lily (*Calochortus clavatus* var. *gracilis*) mitigation for the Sterling Ranch Estates Residential Project (Project). On September, 27, 2022, CDFW, the County, Dudek, Meridian Consultants, and members of the Project applicants team met to discuss CDFW's comments on this memo. This memorandum has been updated to address CDFW's comments.

Background

Slender mariposa lily has a California Native Plant Society (CNPS) California Rare Plant Rank of 1B.2 and is known to occur on the Project site, including the Vesting Tentative Tract Map (VTTM) site, Off-Site Roadway Improvement Area, and Off-Site Water Tank Area. Additionally, slender mariposa lily has been documented at the Off-Site Open Space Dedication Area, located 0.2 mile south of the VTTM site (Figure 1). This species is fairly widespread in the Santa Clarita Valley, and, during focused Project surveys, was observed throughout the VTTM site, Off-Site Roadway Improvement Area, Off-Site Water Tank Area and Off-Site Open Space Dedication Area, primarily on ridgelines and north- and east-facing slopes. Slender mariposa lily typically occurs in chaparral, California sagebrush scrub, and grassland, often on clay and/or rocky soils. Plants were generally mapped on the Project site in areas of high vegetative cover and on soil types including loam and silty clay loam.

The total number of slender mariposa lilies that would be impacted by the Project is estimated to be 171 individuals. Through implementation of Project Environmental Impact Report (EIR) MM BIO-5.3-1 (Conservation Easement), a conservation easement would be established on the Off-Site Open Space Dedication Area preserving the existing slender mariposa lily individuals, estimated to be near 42 individuals, and mitigating for slender mariposa lily Project impacts (Figure 2). As part of recording the conservation easement, a Conservation Management Plan (CMP) would be prepared that specifically identifies the required resource management activities and the entities that

would be responsible for managing those activities in perpetuity. The CMP would include a Slender mariposa lily mitigation monitoring plan (SMLMMP) to be approved by California Department of Fish and Wildlife (CDFW) and the County of Los Angeles. The SMLMMP would provide guidance and methods to preserve the slender mariposa lily individuals known to occur within the Off-Site Open Space Dedication Area conservation easement, along with a program of slender mariposa lily seed collection and dispersal and translocation of blubs from the Project site (VTTM, Off-Site Roadway Improvement Area, and Off-Site Water Tank Area) to the Off-Site Open Space Dedication Area conservation easement area. In June 2022, CDFW approved Project related slender mariposa lily seed collections as follows:

> Seed will be collected from Sterling Ranch Estates Residential Project impact areas by a Dudek biologist(s) familiar with slender mariposa lily. Seed collection will occur throughout the entire population/distribution of slender mariposa lily on the Project site. Seeds will be collected from individuals once the seed has matured, but prior to the seed capsules opening to disperse the seed (dehiscing from seed capsules). The amount of seed collected will equal no more than 5 percent of the number of individuals from this season. Collected seed will be labeled with the collection date and general locations. Seed will be allowed to completely dry out before storage. Seed will be stored in breathable paper bags in a cool, dry, and dark place until planted. After seeds are completely dried out, seed storage in the freezer has been determined to extend the length of seed viability (Andrew Thomson, personal communication).
>
> S&S Seeds will clean and store the seeds. S&S Seeds has extensive experience processing, cleaning, and storing more than 1,000 different species of native plant seeds over the past 40 years. S&S Seeds routinely handles seeds from rare plants to assist with projects involving plant conservation. S&S Seeds has a state-of-the-art seed cleaning facility with all the tools, instrumentation, and machinery to process native seeds (both by hand and mechanically). The facility is managed by staff who have decades of experience working with seed cleaning of all types of native seeds. S&S Seeds maintains multiple storage facilities ranging from a large warehouse to climate controlled storage units designed and managed for the purpose of seed storage.
>
> Dudek will work with S&S Seeds to incorporate the following seed cleaning and storage methods into Dudek's contract with S&S Seeds: We would like to ask that SML seeds collected from Sterling Ranch to be cleaned/stored in a manner so that there is no cross contamination with any Calochortus seeds or SML seeds from other locations that may already be at S&S Seeds. This request is consistent with BMPs for storing rare plant seed at nurseries that are certified to hold or work with listed/rare plant species. We would like to see this specified in Dudek's contract with S&S Seeds. If this is something that S&S Seeds already adheres to, even better.

The SMLMMP would be developed and implemented with a program that does not conflict with other conservation easement resource management objectives. The SMLMMP would include, at minimum 5:1, mitigation for impacts to 171 slender mariposa lily individuals, as well as preservation of the existing population of slender mariposa lily individuals already documented within the Off-Site Open Space Dedication Area conservation easement.

Slender Mariposa Lily Habitat Characteristics

Slender mariposa lily is known to occur in chaparral, coastal sage scrub, and valley and foothill grasslands at elevations of 1,050 to 3,281 feet above mean sea level (amsl; CNPS 2021). During Project surveys, slender mariposa lily individuals were observed and mapped in California sagebrush – black sage scrub, California sagebrush – California buckwheat scrub, California sagebrush scrub, Palmer's goldenbush scrub, purple sage scrub, wild oats and annual brome grasslands, and *Brassica nigra – Bromus diandrus* vegetation communities. Individuals were documented in soil types with loam and silty clay loam surface textures at elevations of 1,272 to 1,788 feet amsl. The soil series included Castaic and Saugus soils, 30 to 65 percent slopes, severely eroded, Castaic-Balcom silty clay loams, 30 to 50 percent slopes, eroded, Saugus loam, 30 to 50 percent slopes, Saugus loam, 30 to 50 percent slopes, eroded, and Yolo loam, 2 to 9 percent slopes. Although individuals were documented on slope gradients from relatively flat to very steep, 5% to 89%, the majority of individuals were found on slopes of 15% to 80%. The slope aspect in areas supporting slender mariposa lily is predominantly northern (north, northwest, northeast), encompassing approximately 97% of the observed individuals, with only 3% on southwest slopes.

Based on the characteristics of occupied slender mariposa habitat on the Project site (vegetation community, soil surface textures, elevation, slope gradient, and slope aspect), a GIS analysis was conducted to identify areas of the Off-Site Open Space Dedication Area where those same characteristics occur. Based on this analysis, the Off-Site Open Space Dedication Area contains approximately 20.32 acres of suitable habitat for the slender mariposa lily (Figure 2).

Using a 3-foot radius from each point and polygon of slender mariposa lily mapped[1], the Project site (VTTM, Off-Site Roadway Improvement Area, and Off-Site Water Tank Area) habitat supporting documented slender mariposa lily occupies a cumulative footprint of 0.065 acres. This 0.065 acres is composed of 0.044 acres of the VTTM, 0.017 acres of the Off-Site Roadway Improvement Area, and 0.004 acres of the Off-Site Water Tank Area, and 0.028 acres of the Off-Site Open Space Dedication Area. Using the same method, the Off-Site Open Space Dedication Area habitat supporting documented slender mariposa lily occupies a cumulative footprint of 0.028 acres.

The Project site (VTTM, Off-Site Roadway Improvement Area, and Off-Site Water Tank Area) contains approximately 57.64 acres of potentially suitable habitat for the slender mariposa lily. Approximately 0.11% of the identified potentially suitable slender mariposa lily habitat within the Project site (VTTM, Off-Site Roadway Improvement Area, and Off-Site Water Tank Area) is occupied by slender mariposa lily.

The Off-Site Open Space Dedication Area contains 20.32 acres of potentially suitable habitat for the slender mariposa lily. Approximately 0.14% of the potentially suitable slender mariposa lily habitat within the Off-Site Open Space Dedication Area is occupied by slender mariposa lily. The remaining 20.29 acres of potentially suitable slender mariposa lily habitat is available for mitigation efforts.

[1] 2017 slender mariposa lily data was used for the VTTM, Off-Site Roadway Improvement Area, and Off-Site Open Space Dedication Area, and 2020 slender mariposa lily data was used for the Off-Site Water Tank Area.

Best Practice Implementation Measures

The SMLMMP would be designed and implemented to minimize environmental impacts at the Off-Site Open Space Dedication Area during translocation, seeding, maintenance, and monitoring. The SMLMMP would include, but not be limited to, the following best practice implementation measures:

- Mark out mapped slender mariposa lilies, including a 4 foot buffer, for avoidance using a methodology clearly visible to maintenance and monitoring staff (e.g. pin flags, lathe stakes, etc.);
- Conduct an environmental training for crews prior to initiation of bulb translocation and seed sowing, maintenance, and monitoring;
- Ensure translocation and seeding, maintenance, and monitoring crews are approved by CDFW;
- Conduct appropriately timed pre-construction nesting bird surveys and wildlife surveys;
- Conduct biological monitoring during bulb translocation and seed sowing;
- Design bulb translocation and seed sowing plots to include approximately 10 clumped planting locations;
- Minimize the number of persons conducting bulb translocation, seed sowing, maintenance, and monitoring;
- Avoid sensitive habitats;
- Prohibit cutting of native perennial shrubs or trees;
- Utilize existing access road for vehicles;
- Utilize multiple access paths to avoid routine disturbance;
- Rake-out micro-topography of anthropogenic disturbances;
- Perform annual monitoring on foot avoiding shrubs and native plants;
- Utilize GPS with resource data layers; and
- Identify methods for seed collection for supplemental seedings.

The SMLMMP would incorporate the following salvage and planting measures:

Seed

- Salvaged slender mariposa lily seed would be stored in breathable paper bags in a cool, dry, and dark place. After seeds are completely dried out, the seed would be stored in the freezer to extend the length of seed viability; and
- As appropriate, a portion (approximately 10%) of slender mariposa lily seed would be held back from seeding and retained as a contingency measure.

Bulbs

- Slender mariposa lily bulbs would be salvaged from known locations within the Project limits of grading. A small digging spade or shovel would be used to salvage bulbs, depending on access constraints and the number of individuals at each particular location; and
- Every attempt would be made during bulb salvage to collect the bulbs with their surrounding soil and associated biomass intact. Due to the soil type found on site, the soil may not stay consolidated as a solid

mass. If soil masses would not stay consolidated, the bulbs would be collected separate from the soil and stored in appropriate storage conditions (cool, dark, and dry location) until planted at the Off-Site Open Space Dedication Area.

Planting Locations - Seed

- Off-Site Open Space Dedication Area planting locations would be chosen based on the occurrence of appropriate soils, slope, aspect, elevation, and vegetation community, outside of known slender mariposa lily locations;
- Prior to planting, planting locations would be prepared by removing all weedy debris and non-native plant species that are potentially invasive and/or pose a threat to the establishment, development, or persistence of slender mariposa;
- Soils in the seed planting locations would be scarified to approximately 1 inch in depth prior to seeding, seed would be sowed by hand, and then the seeded locations would be lightly raked with the backside of a rock rake (or similar) for a target seed depth of 0.25 to 0.50 inch; and
- Each planting area will be marked as detailed below.

Planting Locations – Bulbs

- Salvaged bulbs would be planted at the Off-Site Open Space Dedication Area. Planted bulbs would typically be arranged in a grid pattern to facilitate biological monitoring; however, alternative configurations may be used, as appropriate;
- Bulbs would be planted at a depth of approximately 2–6 inches (depending on the size of the bulb). Smaller bulbs would be planted shallower and larger bulbs will be planted deeper. Bulbs would be oriented correctly (roots down, stem up) in the soil during planting; and
- Detailed notes about planting locations and their GPS coordinates would be kept by the Project Biologist to enable follow-up monitoring.

Receptor Area Fencing and Markers

- Herbivore-exclusion fencing would be installed surrounding planting locations or groups of planting locations to reduce the likelihood of plant herbivory. Herbivore-exclusion fencing would be constructed of poultry netting (or similar) and will be installed at least 18 inches below ground surface and will extend to approximately 30 inches above ground level. Herbivore-exclusion fencing may also be installed to cover the top of each plot; and
- Markers would be installed and maintained at each planting location at the slender mariposa lily Off-Site Open Space Dedication Area locations to identify the planted slender mariposa receptor locations during maintenance and monitoring. The markers may consist of 2-inch by 2-inch by 24-inch wooden survey hub stakes, or equivalent, driven into the ground next to each planting location. The locations would also be recorded with a GPS after planting to facilitate relocating the plots for monitoring and reporting in subsequent years.

Irrigation

- Receptor sites would be watered-in to prevent the formation of cracks and air pockets in the soil. Approximately 1 week after the initial planting period, additional native soil would be spread to fill in any gaps or depressions that may have formed after the soil has settled, and the area will be watered in a second time; and
- If seasonal rains are inadequate to keep the soils moist through the first growing season, supplemental irrigation may be supplied to the Off-Site Open Space Dedication Area as determined by the Project Biologist. Supplemental irrigation would be conducted on an as-needed basis approximately every 2 to 4 weeks during the initial growing season, depending on rainfall, temperatures, and day length. Additional irrigation may be applied in subsequent years as determined by the Project Biologist.

Adaptive Management and Contingency Measures

As part of the Off-Site Open Space Dedication Area conservation easement, the SMLMMP would be implemented in perpetuity. Bulbs may bloom the year following translocation; however, seeds may leaf out the year after planting but may not flower for approximately 2 to 3 years after planting. Therefore, monitoring would start to be more representative after year 3 or year 4 at which time it would become evident if initial bulb translocation and seeding efforts were not achieving the mitigation goals. The SMLMMP would identify an adaptive management approach, wherein, if during the monitoring period, problems affecting the successful establishment of slender mariposa lilies were detected, then corrective measures would be implemented. For example, if during the monitoring period rainfall totals were significantly below average during the growing season for slender mariposa lily (as determined by the qualified biologist), supplemental water might be supplied to help sustain the habitat or slender mariposa lily plants. Any supplemental watering would be conducted to mimic typical rainfall conditions rather than prolonging the growing season.

The SMLMMP would identify additional contingency measure including implementing a program of seed collection and sowing within Off-Site Open Space Dedication Area conservation easement area. Slender mariposa lily seed would be collected and used to supplement plants at the Off-Site Open Space Dedication Area conservation easement area. Due to the high annual variability of flower and seed production in this species, slender mariposa seed would be collected during a “good” year and stored in appropriate conditions to be used as a propagule source when necessary. Additional contingency measures may be implemented through adaptive management, such as herbivory protection, nursery propagation, or other measures as determined necessary to achieve project goals. On July 1, 2022, Dudek biologist Rachel Swick, familiar with slender mariposa lily, collected seed from Sterling Ranch Estates Residential Project impact areas. Seed collection occurred throughout the entire population/distribution of slender mariposa lily within the impact areas of the Project site. Seeds were collected from individuals once the seed had matured, but prior to the seed capsules opening to disperse the seed (dehiscing from seed capsules). The amount of seed collected was equal no more than 5 percent of the number of individuals from this season. Collected seed was labeled with the collection date and general locations. Seed was allowed to completely dry out before storage. Seed was stored in breathable paper bags in a cool, dry, and dark place and on July 29, 2022 was transferred to S&S Seeds for cleaning and storage.

If slender mariposa lily seeding and translocation at the Off-Site Open Space Dedication Area conservation easement fails to progress towards a self-sustaining population with 5:1 replacement (mitigation plantings : impacted individuals) contingency measures would be implemented. One option to supplement a shortfall of slender mariposa lily mitigation at the Off-Site Open Space Dedication Area conservation easement, includes additional off-site, in-kind preservation of slender mariposa lilies within the County, which could be implemented to reach the 5:1 replacement goal.

Additionally, slender mariposa lily has been documented in the northwest portion of the VTTM site. Based on the GIS habitat model, the northwest corner of the VTTM site, within the open space and outside of the fuel modification zones, contains approximately 3.3 acres of suitable habitat for the slender mariposa lily which could be placed in a conservation easement. This area could add to the number of conserved individuals, or actions associated with the SMLMMP could be implemented in this area to assist in achieving slender mariposa lily mitigation.

Rationale for Expecting Mitigation Success

Slender mariposa lilies have been documented on both the Project site and Off-Site Open Space Dedication Area. The Off-Site Open Space Dedication Area is in close proximity to the Project site (0.2 mile to the south), a natural population of slender mariposa lily exists, and it contains potentially suitable site characteristics, such as; vegetation community, elevation, slope gradient, slope aspect, soil series, and soil textures. Off-Site Open Space Dedication Area individuals were documented in soil types with loam and silty clay loam surface textures at elevations of 1,289 to 1,422 feet amsl. The soil series include Castaic and Saugus soils, 30 to 65 percent slopes, severely eroded, Castaic-Balcom silty clay loams, 30 to 50 percent slopes, eroded, Saugus loam, 30 to 50 percent slopes, Saugus loam, 30 to 50 percent slopes, eroded, and Yolo loam, 2 to 9 percent slopes. Individuals were documented on slope gradients from 20% to 89%. The slope aspect in areas supporting slender mariposa lily is northern (north, northwest, northeast).

Establishment of the Off-Site Open Space Dedication Area conservation easement, EIR MM 5.3-1 Conservation Easement, would preserve 37.9 acres of vegetation habitats of which 20.32 acres are suitable habitat for the slender mariposa lily. The relative quality of the vegetation habitats at the Off-Site Open Space Dedication Area is high based on the cover and diversity of native scrubs, minimal anthropogenic disturbances within and directly adjacent, contiguous undeveloped adjacent habitat including the 41.3-acre conservation easement subject to preservation in perpetuity held by Mountains Recreation & Conservation Authority adjacent to the east of the 37.9-acre Off-Site Open Space Dedication Area. The vegetation habitats within the Project impact area are of a lower quality due to the current presence of routinely graded dirt roads, Fire Code and LA County ordinance-required brush clearance, a single-family residence, concrete pad/slab on the southern portion of the VTTM site, and the pad associated with past oil well drilling and operations. These disturbances and development, in addition to the fragmented nature of the native vegetation habitats result in a relative lower quality of habitat. The amount of suitable habitat and relative quality of the vegetation habitats, along with the careful seeding and planting methods described in the Best Management Implementation Measures (above), the minimal anthropogenic disturbances, and contiguous undeveloped adjacent habitats will lead to successful slender mariposa lily mitigation at the Off-Site Open Space Dedication Area.

Based on habitat characteristics (vegetation community, elevation, slope gradient, slope aspect, and soils), the Off-Site Open Space Dedication Area contains 20.29 acres of potentially suitable slender mariposa lily habitat that can be utilized for mitigation efforts. Although slender mariposa lily individuals are rarely if ever evenly distributed and typically exhibit a clumped distribution, a 3-foot radius buffer was used to estimate the space a slender mariposa lily would occupy.

Assuming each slender mariposa lily occupies a 3-foot radius buffer, each lily would occupy 28.27 square feet. Utilizing this method, the 20.29 acres of suitable habitat would have the ability to support 31,259 slender mariposa lily individuals. The Project would impact 171 slender mariposa lily individuals and MM 5.3-1 Conservation Easement requires 5:1 mitigation, resulting in 855 slender mariposa lily individuals which is 2.7% of the total number of slender mariposa lily individuals the Off-Site Open Space Dedication Area would have the ability to support. MM 5.3-1 Conservation Easement, anticipates over-planting to achieve the 5:1 mitigation ratio, which is anticipated to increase the likelihood of success. There is space for this overplanting since the resulting 1,710 slender mariposa lily individuals would theoretically fill only 5.5% of the total number of slender mariposa lily individuals that the Off-Site Open Space Dedication Area would have the ability to support. Considering the variability of suitable habitat, the distribution of slender mariposa lily, and the actual area a slender mariposa lily would occupy, based on this best available information the Off-Site Open Space Dedication Area has the ability to support the required slender mariposa lily mitigation plantings.

Dudek's previous work with salvaging, transplanting, and establishing Calochortus (both *Calochortus clavatus* var. *gracilis* and *Calochortus plummerae*) at the Newhall Land project – RiverVillage indicates that successful results can be achieved at the Off-Site Open Space Dedication Area by following procedures developed for that project. In the autumn of 2005, seeds and 687 bulbs were salvaged from the RiverVillage footprint and planted into selected sites in similar habitat in late 2005 and early 2006 (Dudek 2006). Despite two successive years of drought following transplantation, there was a success rate of 69% in 2005–2006, 34% in 2006–2007, and 93% in 2007–2008 (Dudek 2007a, 2007b; Thomson 2008 as cited in Dudek 2007c). As part of this project, there was particular interest in documentation of the success of seeding efforts. Each year for the first three years of the program, persisting juveniles from the seeding efforts were documented. This site received adaptive management measures during the extreme drought conditions in the first and second years, wherein some supplemental hand-watering of the plots occurred. By comparison, almost no naturally occurring Calochortus in the nearby reference population were observed in 2005–2006, none were observed in 2006–2007, and approximately 75% of known individuals were observed flowering in 2007–2008. The number of individuals observed each year corresponded with rainfall amounts, with declining numbers in low rainfall years, and increasing numbers in higher rainfall years.

The Off-Site Open Space Dedication Area is in close proximity to the Project site (where slender mariposa lily has been documented) and the Off-Site Open Space Dedication Area currently supports a natural population of slender mariposa lily, contains a high cover and diversity of native scrubs contiguous with adjacent undeveloped habitat adjacent, contains suitable slender mariposa lily site characteristics (vegetation community, elevation, slope gradient, slope aspect, and soils). Based on the analysis above, the Off-Site Open Space Dedication Area has the ability to support the mitigation lilies required, experiences minimal anthropogenic disturbances, is within the region of documented successful slender mariposa lily bulb translocation and seeding projects, and the SMLMMP would contain adaptive management and contingency measures; therefore, based on the best available information the Project slender mariposa lily mitigation would be successful.

References

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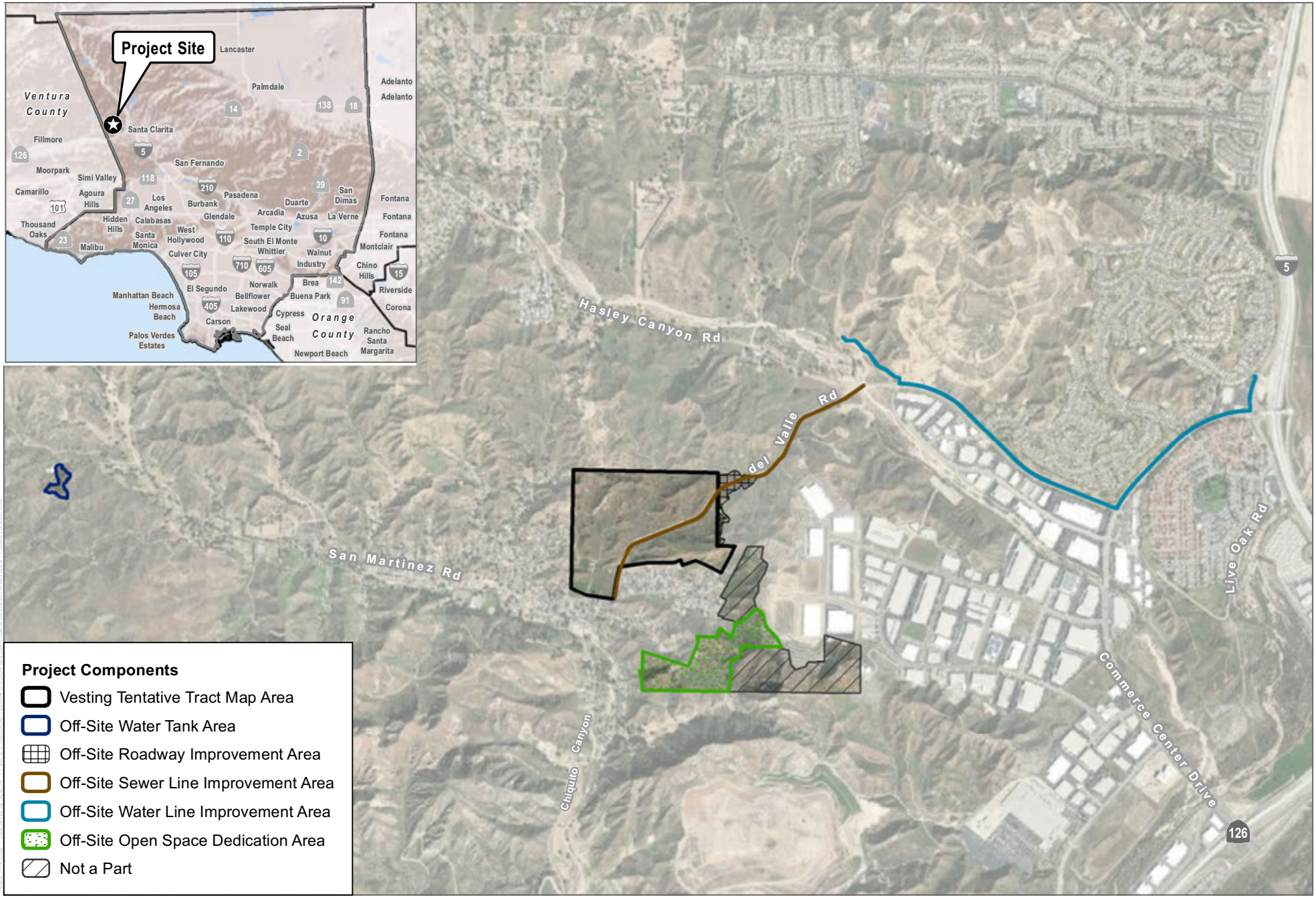
Dudek. 2007a. Site Observation Report for RiverVillage Calochortus translocation. Report 8. January 16, 2007.

Dudek. 2007b. Site Observation Report for RiverVillage Calochortus translocation. Report 14. April 25, 2007.

Dudek. 2007c. Revised Draft Slender Mariposa Lily Mitigation and Monitoring Plan for the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan Study Area. August 2007.

Thomson, A. 2008. Personal observation of lily monitoring results by Andy Thomson (Dudek) at RiverVillage project site, October 7, 2008.

Attachments



SOURCE: DigitalGlobe 2017

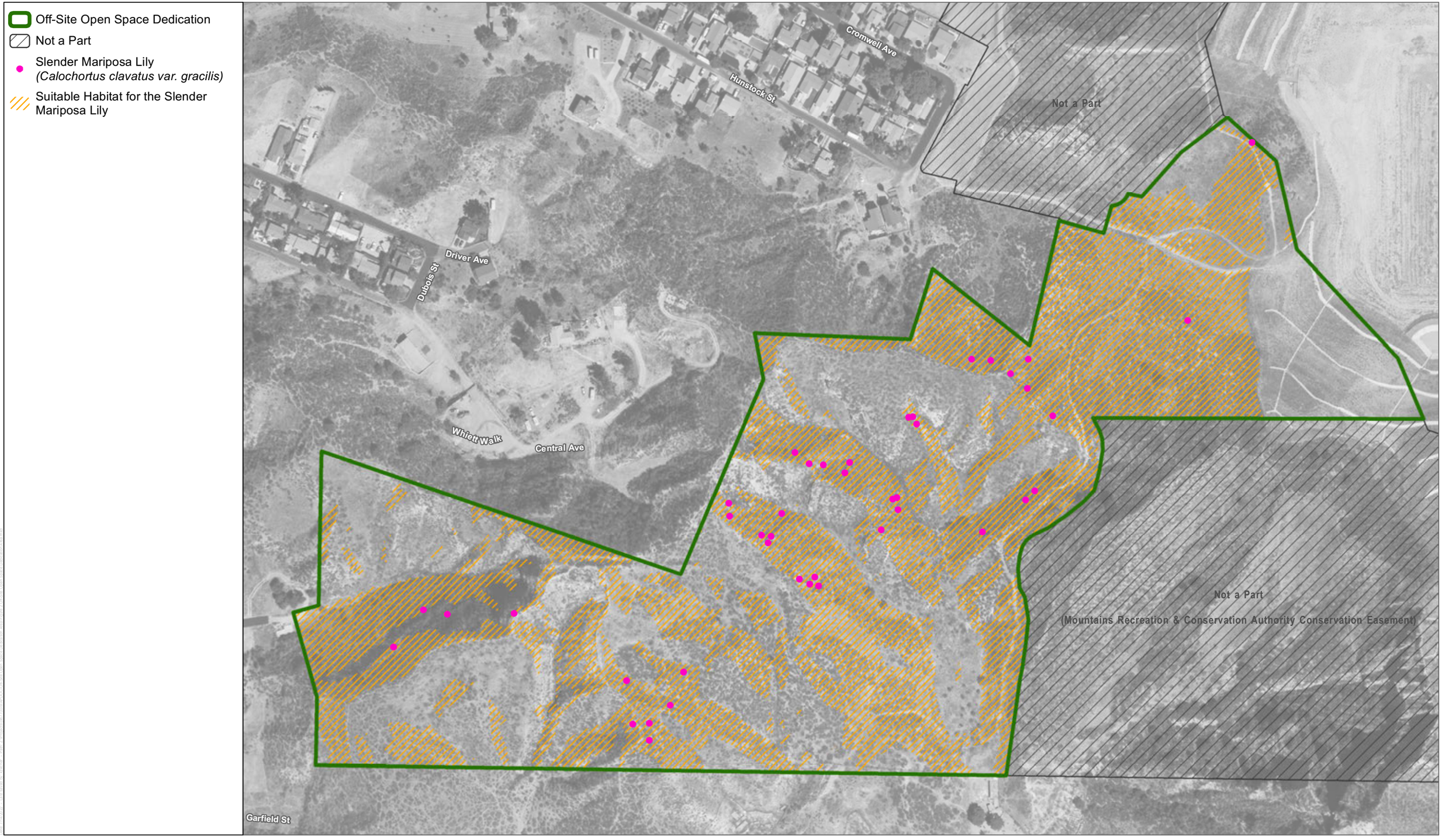
DUDEK

0 1,000 2,000 Feet

FIGURE 1

Project Location

Sterling Ranch Residential Estates Project



SOURCE: NAIP 2020

DUDEK 0 100 200 Feet

FIGURE 2

Off-Site Open Space Dedication Area

Biological Technical Report for the Sterling Ranch Residential Estates Residential Project