December 10, 2018

Via email (executiveofficer@bos.lacounty.gov)

Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 West Temple Street Suite 383
Los Angeles, California 90012

Re: Centennial Specific Plan Project No. 02-232 – Applicant Responses to Project-Related LA Times and SCV News Content Dated August 30, 2018 to December 8, 2018, and Correspondence Received December 6, 2018

Dear Honorable Board of Supervisors,

In advance of the December 11, 2018 hearing during which the Los Angeles Board of Supervisors ("Board") will consider Centennial Specific Plan Project No. 02-232 ("Project"), the Tejon Ranch Company ("Applicant") would like to address Project-related content that has appeared in the LA Times online, and online at SCV News, from August 30, 2018 to December 8, 2018. As such, enclosed please find the following Exhibits:

Exhibit 1 Responses to December 6, 2018 Letter to the County Planning Department, from the Center for Biological Diversity, California Native Plant Society, and Center for Food Safety, Re: “Final Environmental Impact Report for the Centennial Specific Plan (SCH No. 2004031072)”

Exhibit 2 Responses to December 6, 2018 California Native Plant Society Letter to the Board, Re: “Clarification of the Fire Risk on the Centennial Specific Plan Project Site”

Exhibit 3 Responses to August 30, 2018 Reader Reaction at LA Times Online: “The Suburban Centennial Development is a Fire Tragedy Waiting to Happen”

Exhibit 4 Responses to December 6, 2018 Reader Reaction, LA Times Online: “Centennial will Burn…”

Exhibit 5 Responses to December 7, 2018 SCV News Article: “Dec 11: Supes May OK Centennial at Tejon Ranch Development”

Exhibit 6 Responses to December 8, 2018 LA Times Editorial: “Just Say No to More Southern California Sprawl”

Thank you for your consideration.

Sincerely,

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Tejon Ranch Co. (NYSE:TJX) – a diversified real estate development and agribusiness company
The following responds to the December 6, 2018 letter that the Center for Biological Diversity, California Native Plant Society, and Center for Food Safety (“Commenters”) sent to the Los Angeles County Planning Department about the Centennial Specific Plan Project (“Project”) and its Environmental Impact Report (“EIR”) prepared under the California Environmental Quality Act (“CEQA”). The below responses address Commenter’s letter using the same headings as Commenters, for ease of reference.

Response to Introductory Comments

These introductory comments concerning commenter organizations are noted and do not require a response.

Response to I. “There is a Mismatch Between the Project as Described in the EIR and the Project as Set Forth in the Development Agreement”

Commenter inaccurately contends that the proposed Centennial development agreement (DA) gives the Applicant “unbridled discretion in what to build, and when to build it,” citing cherry-picked phrases from DA sections 2.2 and 2.3. As such, Commenter argues, the Project would be built “in a very different manner that what [sic] was proposed in the EIR and Specific Plan” and, therefore, “there appears to be a 'mismatch' between the project phasing as outlined in the EIR and the project phasing as allowed for by the Development Agreement,” thereby undermining the EIR’s project description. As explained below, this argument is without merit and it ignores language in the same DA sections that significantly restrict project phasing requirements so as to ensure that the Project will not be built in manner that substantially deviates from the Centennial EIR or Specific Plan.

In order to address the Supreme Court’s holding in Pardee Construction Co. v. City of Camarillo, 37 Cal.3d, 465 (1984) (holding that the failure of the parties to a development agreement to provide for the timing of development permitted application of a subsequently enacted initiative that restricted development timing), DA section 2.3 acknowledges – in isolation - the parties intent to provide the Applicant the right “to develop the Property in such order and at such rate and times as Property Owners deem appropriate within the exercise of their respective sole and subjective business judgement.” Similar language is included in DA section 2.2, which explains – in isolation - that the DA requires the Applicant to proceed with construction of the Project or any portion thereof. Such provisions are commonplace in California development agreements and here reflects the parties' determination that the Applicant has the authority to determine the rate and timing of development as a general matter. Importantly, however, Commenter’s cherry-picked DA quotes conveniently exclude other provisions of DA sections 2.2 and 2.3 that restrict the Applicant’s ability to ignore Project phasing requirements in ways that put the lie to Commenter’s claim that the DA grants the Applicant “unbridled discretion in what to build, and when to build it, on the Project site.”

Specifically, DA section 2.3 expressly states that “this Section 2.3 does not in any way affect the specific timing, implementation or provision of improvements or other requirements of the Project to the extent such timing, implementation, or provision of improvements or other requirements are set forth in the Specific Plan or in this Agreement (including, without limitations, as addressed in the On Site Infrastructure and Phasing Plan)” (emphasis added). A similar limitation is set forth in the DA
section 2.2. Thus, despite Commenter's claim to the contrary, any contractual right the Applicant may have under the DA to determine the timing and location of Project construction is expressly subject to requirements of the Specific Plan and the DA, both of which impose requirements designed to protect against Project development in a manner that significantly deviates from the Centennial EIR. Moreover, while the EIR analyzes the Project per the Conceptual Phasing Plan to be implemented over a 20-year period (i.e., Specific Plan Figure 4-1), there are many further points in time at which Project development will be reevaluated to ensure that no new or more significant impacts are occurring at each phase of development, and to ensure compliance with the many requirements applicable to the Project, including the Specific Plan, Development Agreement, regulatory requirements, mitigation measure requirements, and continuing CEQA compliance.

At the highest level, the Specific Plan's Conceptual Phasing Plan provides an organizational framework to facilitate development under the Specific Plan, while ensuring the provision of appropriate infrastructure and facilities necessary to support Project development. To ensure continued appropriate phasing throughout Project buildout, prior to the first phase and each successive phase of the Project buildout, the Applicant is required to submit a phasing plan for proposed development, which must be consistent with the master phasing plan of the Project, including the timing of public facilities and other improvements. These successive phasing plans shall include, but not be limited to: a) a narrative and tabular description of open space, recreation, dwelling units, non-residential uses and their square footage, and public facilities; b) a jobs-housing balance summary; and c) a phasing map graphically delineating such items, to the satisfaction of the County of Los Angeles' Department of Regional Planning.

The major mechanism by which Project phasing will be implemented is the Tentative Tract Map (“TTM”), a subsequent approval without which development is not permitted to proceed. TTM serve as the implementing mechanism for all Project land uses and are processed in accordance with a local subdivision ordinance adopted pursuant to the California Subdivision Map Act (Map Act). The primary objectives of the Map Act include the coordination of subdivision design (lots, street patterns, rights-of-way for drainage and sewers, etc.) with applicable plans and ensuring that public improvements are properly completed and will not cause substantial damage to the environment or undue risk to human health and safety.

Per the Los Angeles County Subdivision Ordinance, the approval of each future TTM for the Project must ensure compliance with the Specific Plan and ensure that public facilities, such as transportation improvements that meet Project demand under forecasted cumulative conditions, are appropriately implemented. Indeed, a TTM application must be denied the local agency makes any of the following findings: (i) the proposed map and subdivision design is not consistent with the applicable general plans and specific plans; (ii) the site is not physically suitable for the proposed density of development; (iii) the subdivision design and improvements are likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife; (iv) the subdivision design or improvements are likely to cause serious public health problems; (v) the subdivision or improvement will conflict with public easements. In addition, all TTM approvals for an area within

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3 Id.
4 Specific Plan, pages 4-1, 4-22.
5 Government Code Section 66410, et seq.
7 Government Code Section 66474.
a very high fire hazard severity zone require findings supported by substantial evidence that (a) the subdivision is consistent with the any applicable regulations adopted by the State Board of Forestry and Fire Protection, (b) that adequate structural fire protection and suppression services will be available, and (c) that ingress and egress for the subdivision meet all applicable road standards for fire equipment access. The TTM process will therefore be used to establish the precise boundaries of all lots, and the exact locations of streets and other infrastructure, in a manner that is protective of the environment and public safety.

Pursuant to DA Exhibit G, item 23.1, for each Project TTM application, the Applicant is required to include sufficient land designated for commercial, retail, mixed use, business park, and industrial uses (so-called “Job Producing Land Use Designations”), along with substantiating information, that would reasonably demonstrate and permit the County to determine that a balance of jobs and housing could be attained upon Project development. In addition, DA Exhibit G, item 23.2, expressly provides that any TTM application that includes both residential and “neighborhood center” land use designations is subject to a condition of approval that requires the Applicant to (i) rough grade one “neighborhood center” lot or parcel and (ii) to stub wet and dry utilities to the lot parcel prior to issuance of the first certificate of occupancy that would exceed 50% of the residential units allowed in such TTM. Moreover, DA Exhibit G, item 23.3, obligates the Applicant to use good faith efforts to market the Job Producing Land Use Designations to third party users. Finally, DA Exhibits E and E-1 set forth a detailed project phasing plan that ensures that a laundry list of Project amenities (e.g., infrastructure, fire, sheriff, schools, parks, retail center, grocery store) are constructed prior to the Project’s first residential certificate of occupancy. As evidenced by the Specific Plan and DA requirements, all of which apply to the Project despite DA sections 2.2 and 2.2, Commenter’s concern that “portions of the Specific Plan (e.g., residential portions) may be built out and still comply with the Plan, even while commercial portions are not built or delayed for many years” is simply unfounded.

It is also noteworthy that nothing in the DA allows the County to evade its obligations arising under the subsequent environmental review provisions of Public Resources Code § 21166. The MMRP requires that at appropriate checkpoints, such as each TTM application, Project conditions and impacts be evaluated to ensure that EIR assumptions continue to be correct, and that there are no new or more significant environmental impacts associated with Project development than previously identified in the EIR. Moreover, since a TTM is a discretionary approval, the County will be required to undertake subsequent or supplement environmental review under CEQA Section 21166 in the event there is substantial evidence of any of the following circumstances:

(a) Substantial changes are proposed in the project which will require major revisions of the EIR; or

(b) Substantial changes occur with respect to the circumstances under which the Project is being undertaken which will require major revisions in the EIR; or

(c) New information, which was no known and could not have been known at the time the EIR was certified as complete, becomes available.

The Hearing Officer or Regional Planning Commission will exercise all duties associated with submittal, review, and approval, conditional approval, or denial of each TTM application, including

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8 Government Code Section 66474.02(a).
9 Specific Plan, pages 4-12, -13.
compliance with CEQA. The Hearing Officer or Regional Planning Commission will also assess each Project TTM application for compliance with the Specific Plan, implementation of relevant mitigation measure requirements, compliance with state, regional, and local regulatory requirements and development standards, and phasing, infrastructure requirements, and community benefits as specified in the Development Agreement.

This process will be repeated for further discretionary approvals required to establish Project uses. For example, certain uses require a discretionary Conditional Use Permit, which is a method by which the County controls the location and operation of certain use types or establish limitations under which a use may operate. Approval of a Conditional Use Permit is based on an analysis of the use’s consistency with the General Plan, the Specific Plan, compatibility with surrounding uses, adequacy of public facilities, and potential environmental impacts. This and other discretionary use approvals will therefore require the same inquiry as would apply to a TTM – the County will assess the application for compliance with the Specific Plan, implementation of relevant mitigation measure requirements, compliance with state, regional, and local regulatory requirements and standards, and phasing, infrastructure requirements, and community benefits as specified in the Development Agreement. Finally, the County will determine whether any circumstances requiring subsequent or supplemental CEQA review per CEQA Section 21166 apply. Therefore, per the above non-exclusive examples of Project implementation requirements, the County will continue to ensure throughout Project development that appropriate infrastructure and service needs are meet, and that there is no possibility of inadvertent, new, or worse environmental impacts than have been studied in the EIR.

As required by CEQA, the Centennial EIR provides an accurate, stable, and finite project description. While it acknowledge that rate and sequence of Project development over multiple decades will be influenced by multiple events, such as shifting demographics and market conditions, both the Specific Plan and DA impose several requirements and performance standards on Project build out designed to protect against a development pattern that significantly deviates from the Centennial EIR’s assumptions. And in the event of proposed Project changes, the Specific Plan’s mandated process for the subsequent approval of discretionary entitlements will be subject to appropriate CEQA review and analysis. Contrary to Commenter’s implied claim, CEQA does not require the Centennial EIR to “anticipate every permutation or analyze every possibility.” See, Citizens for a Sustainable Treasure Island v. City & County of San Francisco (2014) 227 Cal.App.4th 1036, 1053-54, 1067. Under CEQA, a project description does not violate CEQA simply because it “provides for flexibility needed to respond to changing conditions and unforeseen events that could possible impact the Project’s final design.” Id. This is particularly true where, as here, the EIR and Specific Plan do not attempt to evade or provide a shortcut around the environmental review process as it applies to future site-specific discretionary approvals, but rather expressly provide for further CEQA compliance at subsequent stages of the entitlement process. Id. at 1051.

Finally, Commenter’s argument that the Centennial EIR is somehow deficient because its project description purportedly fails to account for the potential future construction of accessory dwelling units (ADUs) on the site is also without merit as similar arguments are routinely rejected by reviewing courts. For example, in Save Round Valley Alliance v. County of Inyo (2007) 157 Cal.App.4th 1437, 1450-51 (“Save Round Valley”), it was claimed that a project description for a 27-unit development was impermissibly unstable because it failed to account for the potential construction of on-site ADUs. The Save Round Valley court rejected this argument, holding that "the possibility

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10 Specific Plan, page 4-12.
11 Specific Plan, page 4-18.
12 Specific Plan, page 4-18.
that future lot owners will or will not build a second unit is extremely uncertain, and any impact of such second units is highly speculative.” Id. at 1450. An EIR is not required to analyze uncertain future activities that are not reasonably foreseeable consequences of the project. See, No Oil, Inc. v. City of Los Angeles (1974) 13 Cal.3d 68, 77 n. 5. As in Save Round Valley, Commenter’s argument regarding the potential construction ADUs on the Project site is purely speculative. As such, the EIR project description was not deficient for its purported lack of analyses concerning this speculative future land use.

Response to II. “Biological Analysis and Mitigation”

The comment states that the FEIR still fails to address significant issues and impacts from creating a new city in this most remote and wild open space remaining in Los Angeles County. Section 5.7 of the Draft EIR provides a complete project-level assessment of all biological resource impacts of the Centennial Project. All data collected for the Project are presented and analyzed using the best available scientific information to determine the impacts of the Project as required.

The comment goes on to state that the Project will permanently disrupt the unique junction of three of California’s ecoregions that connect southern California to the rest of the state. While the Project site is within the general region of convergence of three biological regions, it does not contain this entire convergence within its borders. Rather, the convergence is generally occurring in the area, inclusive of on-site as well as mostly off-site lands. Project implementation would include mitigation actions (see Section 5.7.7, Mitigation Measures, of the Draft EIR) resulting in improved functions and values of many of the biological resources on these lands, in addition to preservation in perpetuity, within the 39,000-acre Centennial Mitigation Preserve as described in PDF 7-1 on page 5.7-135 of the Draft EIR. Furthermore, the Mojave Desert ecoregion does not “connect” Southern California to the rest of the state through the project area in any way. On the other hand, the mountain ranges do connect southern California Mountains with Central and Northern California mountains. However, the project does not disrupt that connection primarily because it does not occur in those mountainous areas. Please also see Final EIR, Volume 2, Response to Comment F.8-112.

Response to II.A. "General Comments on the Biological Issues in the FEIR"

Commenters state that the AVAP does not alleviate the County's responsibility to evaluate the irreplaceable resources within the Economic Opportunity Area designated in the plan. The comment proceeds stating the fact that the AVAP adopted the EOA intended to facilitate Centennial and anticipated the future land use designations of the project prior to any publicly available environmental review for centennial, foreclosed a neutral environmental review and impact analysis of the proposed project. The County have prepared an EIR which provides a description of its evaluation and its results. All areas, within or outside of zoning overlays (EOA or otherwise), are fully analyzed in that document.

Commenters also state that within the updated MM 4-2 in section 5.4 of the Draft EIR, the term “probation” needs to be “prohibition.” This is clearly a typographical error, which the County may revise. The comment also states that the prohibition through CC&Rs fails to ensure enforcement. As described in Response to Comment B.4-16, CC&Rs are a binding enforcement mechanism, and that violations of the CC&Rs are subject to private enforcement by the master developer and HOA. As a volunteered mitigation measure the County also has CEQA enforcement authority per the MMRP. Commenters also state that MM 4-2 in not consistent with MM 7-16 which prohibits all rodenticide as opposed to just those containing anticoagulants. The bullet in MM 4-2, as described in Response to Comment B.4-16, should also be updated to correct this typographical error, to remove the words “containing anticoagulants.”
Commenters next state that the EIR fails to address inadvertent introductions of non-native species which would impact the site and conserved areas. In fact, non-native plants and typical expected wildlife species are addressed in the document in several locations. MM 7-16 and 7-18 on pages 5.7-191 and 5.7-193 of the Draft EIR describe Project requirements to reduce impacts of non-native ants and other pests. Response to Comment B.4-41 also provides additions to MM 7-16 which prevent the invasion of Argentine ants into Mitigation Preserve lands by establishing “dry zones” of a minimum of 350 feet between development and the Mitigation Preserve. Soil moistures shall be maintained at levels below about 10 percent soil saturation within dry zones to deter the establishment of nesting colonies of ants. All landscaping materials to be used in these zones shall be inspected and certified as “free” of Argentine ants prior to planting. Additionally, these materials shall be inspected by a qualified restoration specialist for the presence of Argentine ants. Plants or other materials with Argentine ants shall be rejected. In addition to prohibiting a list of invasive plant species per MM 7-13, MM 7-15 requires a public awareness program to restrict public access to the riparian and open space areas. MM 7-15 would require installation of waste and recycling receptacles that discourage foraging by wildlife species; inspection of all landscaping materials to ensure that they are free of Argentine ants prior to planting; and distribution of educational pamphlets to future Project residents regarding the importance of not feeding wildlife. MM 7-17 requires the implementation of a public awareness program in an effort to restrict public access to the riparian and open space areas to designated trails and to prevent unleashed domestic animals from entering these areas. This program include signs that identify the boundaries of ecologically sensitive areas; the use of temporary fencing around sensitive areas; and the promotion of public education and awareness of such areas. In addition, only passive recreational activities shall be permitted in designated natural open space areas, and all dogs shall be required to be leashed while in the designated natural open space areas. Furthermore, MM 7-1 on page 5.7-173 of the Draft EIR, the Special Status Plant Species Restoration Plan include methods for non-native invasive weed control. And, as stated on page 5.7-181, MM 7-10, long-term management of preserved areas will include focused major problematic non-native species eradication (e.g., feral pigs) where feasible.13 Also see Responses to Comments B.4-41 and F.8-119.

Commenters assert that there is potential for the techniques to be included in the Integrated Pest Management (IPM) program to harm and displace resident small mammals through “habitat modification and the judicious use of pesticide” which would adversely impacts small mammal populations and the predators that feed on them. All actions taken as part of the implementation of the IPM would be limited to work within the bounds of the project allowances and within the assumed impacts analyzed in the EIR. For example, the use of rodenticides is prohibited on the project and therefore would not be an allowed technique to use in implementing the IPM. In regard to the using other pesticides which may cause impacts to predators over the long term, the actions of the IPM are based on removal of non-native pest and would not include native mammal poisoning to such an extent that populations of predators would be affected. The IPM program is widely recognized as the leading authority for providing documentation and guidance for the implementation of pest management approaches in urban (and other) contexts that avoid and minimize the use of pesticides and other measures that could harm the environment and wildlife other than the target pests.

Commenters next suggest that project development would cause urban and suburban adapted species to exploit the conservation areas that are in proximity to the development and would potentially outcompete existing wildlife and therefore the conservation areas should not be

13 Id., p. 5.7-181
Exhibit 1 to December 10, 2018 Tejon Ranch Company Letter to the Los Angeles County Board of Supervisors

considered mitigation areas associated with the project and mitigation strategies need to be included to minimize impacts to existing wildlife. As stated above, mitigation measures are in place to lessen the impact from potential wildlife pest species.

With regard to species mentioned by Commenters, as addressed in the Draft EIR, the habitat within the Project footprint does not represent important breeding habitat, or otherwise, for species mentioned in the comment (burrowing owl, kit fox), and therefore Project development would not be expected to have a significant impact on regional populations. Regarding wildlife movement, the open space areas remaining within the development are not intended as habitat linkages, but instead are expected to be used for local movement. North-south wildlife connectivity is expected to occur in the habitat occurring within the adjacent SEA. The Draft EIR’s biological resources analysis indicates that significant impacts to wildlife movement and general wildlife habitat would result from implementing the Project but these impacts would be reduced to less than significant levels with implementation of MM 7-14 through MM 7-18 on pages 5.7-190 through 5.7-193.

The Commenter’s opinion that the land proposed for mitigation is inadequate is noted, but as documented in the EIR, the lead agency disagrees. The quality of land represented in the Mitigation Preserve has been proven to be of high quality through various multi-year studies (See Appendix 5.7-C of the Draft EIR). For further discussion of wildlife movement, see Final EIR responses to Comments B.2-3 (letter B.2 is from DWR), B.4-34 through B.4-37, B.4-56 and B.4-57, B.4-75 (letter B.4 is from CDFW), F.3-23 through F.3-25, and F.3A-32 through F.3A-34 (letters F.3 and F.3A are from the Tri-County Watchdogs), F.5-2 (letter F.5 is from the SMMC), F.7-22 (letter F.7 is from the TPLMTC), F.8-109 and F.8-110, F.8-165 through F.8-169 (letter F.8 is from CBD, CNPS, and CFS), and ADD-F.2-16.

Commenters next assert that the EIR is lacking in its assessment of wildlife movement, with no evidentiary support. Rather, wildlife movement on the project site, including the content of this comment, has been discussed extensively and appropriately. For further discussion of wildlife movement, see Final EIR responses to Comments B.2-3 (letter B.2 is from DWR), B.4-34 through B.4-37, B.4-56 and B.4-57, B.4-75 (letter B.4 is from CDFW), F.3-23 through F.3-25, and F.3A-32 through F.3A-34 (letters F.3 and F.3A are from the Tri-County Watchdogs), F.5-2 (letter F.5 is from the SMMC), F.7-22 (letter F.7 is from the TPLMTC), F.8-109 and F.8-110, F.8-165 through F.8-169 (letter F.8 is from CBD, CNPS, and CFS), and ADD-F.2-16. With regard to a Cement Plant crossing, such crossing is not appropriate. Rather, the Project’s undercrossing leads from one area of open space to another area of open space, in order to facilitate wildlife movement.

With regard to the TUMSHCP, it is understood that it does not provide any coverage for the impacts of the Centennial Project, and that implication was never put forth in the Draft EIR nor the FEIR. Rather, mention of TUMSHCP was intended to highlight the fact that through implementation of that plan, as well as the TRCRWA, large blocks of land would be preserved in perpetuity.

Commenters provide no support for the assertion that the site’s vegetation affects wildlife movement. Rather, as discussed above, the EIR thoroughly and appropriately studies and discusses regional and local wildlife movement, and this comment requires no further response.

Commenters next state that the FEIR relies on unsubstantiated statements to downplay the vegetation resources on the proposed project site then goes on to quote text from the FEIR. Both of the quoted statement regarding grazing impacts and non-native species are accurate and are thoroughly substantiated within many focused botanical surveys reports and grassland compositions discussions as summarized on pages 5.7-25 to 5.7-27, 5.7-42 to 5.7-47, and 5.7-158 to 5.7-160 of the Draft EIR. In addition, the purpose of these statements is only intended to describe the existing resources of the site. Commenters proceeds to state that vegetation surveys by Vollmar
indicate the opposite of these statements. The statements are in fact not opposites. The FEIR statements specifically mention clear, undisputable impacts of a history of grazing and species occurrence densities that have been observed on the site. The Vollmar report statements, that the project site contains native grasslands of statewide significance and the last best contiguous grasslands and wildflower fields in California, do not include any comparable evidence in support of the statement. However, all the botanical data collected and field observations made and included in the Vollmar report are part of the DEIR’s detailed description of the site vegetation and plant species presence and distribution. The comment further proceeds to state that the County has previously taken the position that the site’s native grasslands are highly significant and the County has proposed to include the project site’s grasslands within the Antelope Valley SEA. The EIR clearly remains generally consistent with the stated past positions by providing detailed grassland studies, discussing the notable native grassland patches on the site, and subsequently requiring mitigation for impacts and including grasslands on the project site within SEA designations.

The comment continues stating that the County’s consultant challenged the inclusion of native grasslands in the SEA and then quotes County staff statements that the department reaches a different conclusion and does not think that grazing means lack of biological value. Further, the comment says that the County rejected the applicant’s consultants suggestion that the conservation potential of the grasslands had already been adequately considered as part of the TRCLUA. Finally the statement concludes by stating that the County caved without providing an explanation. Please note that the SEA designation on the site greatly expanded since the project’s original SEA consultations, and many of the grasslands are retained within those SEA boundaries. Although boundaries have changed many times in the interim draft SEA boundary versions, they have all continued to preserve many acres of grasslands on the site.

Commenters continue to disagree that grazing is appropriate for the Project site, but the County has thoroughly and adequately addressed this issue. Grazing is anticipated to continue to be a key component of the management of open space lands, and the value of grazing as a means of protecting plant species has been consistently recognized by federal and State biological protection agencies. For further discussion, see Final EIR, Responses to Comments B.4-17 and B.4-60, F.8-10, F.8-131, and F.8-173.

With regard to microtrash, MM 7-6 includes stipulations that routine community maintenance activities include regular efforts to eliminate microtrash on and near all wok sites, recreational events, roads, and adjacent open space areas would apply to any material recovery facility/transfer facility. These facilities are not exempt from MM 7-6, and appropriate steps would need to be adhered to in order to comply.

Response to II.B. “Responses to Responses to Comments in the FEIR”

Commenter states that the FEIR fails to justify the lack of implementation of avoidance and minimization before turning to mitigation, however, the Project has undergone a significant decrease in footprint size compared to earlier designs in order to avoid sensitive plant and wildlife habitat. Commenter also provides further comments in response to Response to Comments, to which the Applicant replies below.

F.8-108: The statement in response to Comment F.8-108 that the scientists and representatives of the six leading environmental groups signed the Tejon Ranch Land Use and Conservation Plan was not intended as a biological impact assessment. Impacts on biological resources are assessed...
independently and not all determinations were considered less than significant on a cumulative level (e.g. wildlife movement).

**F.8-112A:** The opinion of the commenter that the landscape level goals for the proposed Project area in the *Proposed Reserve Design for Tejon Ranch – A Threatened California Legacy* remains valid is noted. No further response is required given that the comment does not address or question the content of the Draft EIR or FEIR. The 2004 Vollmar report that is mentioned in the comment is discussed in detail in response to Comment F.8-114.

**F.8-116:** Commenter's assertion is incorrect. For discussion of mitigation ratios, please see Final EIR, Response to Comment ADD-F.2-27.

**F.8-116A:** Replying to Response to Comment F.8-116-A, the comment states that the FEIR incorrectly concludes that the unknowns of mitigation are lower for the project because the mitigation lands are known already, and resources within them have been identified. The commenter disagrees that this is true, because the management of the lands through the RWMP is a "grazing plan" and already exists and did not protect the site in the past. As discussed in more detail below with regard to Response to Comment F.8-128, the RWMP includes many conservation measures with the goal of retaining native plants and wildlife. In addition, the effects of nearly 100 years of grazing are not expected to be reversed by the RWMP. The purpose is to retain existing values and increased values would be above and beyond mitigation requirements. Commenters go on to assert that the RWMP does not ensure funding, and that the conservation easement holder should not be the Tejon Ranch Conservancy but a different entity to ensure long term funding of land management. Response to Comment F.8-116-A thoroughly explains why it is not appropriate and the commenter does not agree. The commenter’s opinion is noted but no further response is warranted.

**F.8-117:** The EIR never asserts that biological surveys for every species was conducted on the Project site every year for 16 years. Standard practice refers to the biological survey method of assessing a habitat for the required components needed for specific species, then proceeding to conduct focused protocol (when available) surveys if potentially suitable habitat is present. If multiple years of surveys are negative for a certain species, it can be deduced the species is absent from the site. If site conditions change to be more favorable for the species, surveys would need to be repeated.

**F.8-119:** Replying to Response to Comment F.8-119, Commenters argue that the response does not adequately explain how the replaced grasslands will include equal or greater value grasslands as the impacted lands. The evaluation of the grasslands both on the site as well as within the Mitigation Preserve are detailed and extensive and are described in sufficient detail for replication to assess future conditions relative to current conditions. It is understood that similar methods, which represent standard methods of the time, would be employed to verify biological resource distribution and their values.

**F.8-120:** Replying to Response to Comment F.8-120, Commenters assert that soil type is important in determining plant presence and should have been used in the modeling effort, and that Response to Comment F.8-120 does not adequately explain why it was not. As noted in the EIR, the Commenter is correct in identifying the correlation between soil types and plant occurrences, as noted in the 2004 Vollmar Consulting study referenced by the Commenter, and as discussed in the Draft EIR, Chapter 5.7 Biological Resources, on pages 5.7-20 (Table 5.7-2), 5.7-24 through 27, 5.7-29, 5.7-41, 5.7-43, 5.7-44, 5.7-46, 5.7-83, 5.7-85, 5.7-87 through 5.7-93, 5.7-157, and 5.7-266. The determination of modeling parameters was based on field determination and although soils are often an indicator or plant species presence or absence, they were not determined to accurately reflect ground trothed
data as described in the various NRC studies summarized in Draft EIR Section 5.7. The model used those parameters which best allowed it to accurately predict native bunch grass presence. Commenters further argue that other native grasses were not included in the model beside bunch grass and should have been. However, the model was intended to predict bunchgrass distribution because this species was the defining factor for the native grassland vegetation type. Therefore, other native grasses would not have contributed in predicting native grassland locations be definition.

F.8-123: Replying to Response to Comment F.8-123, Commenters assert that it is unclear how mitigation in Kern County can mitigate for impacts in Los Angeles County. The determination of biological functions and values does not consider political boundaries. Mitigation is required per CEQA, which does not require mitigation to occur within the same County of impact. The locations for mitigation reflects the most similar habitats impacted on the project site regardless of County boundaries. The comment goes on to state that it is unclear how the mitigation lands of the Southern Slopes are similar based on the data provided. The indices of similarity are actually considered high in statistical terms and do indicate a considerable degree of similarity for different sites as described in Final EIR, Response to Comment F.8-123. The comment then states that different types of indices were used in the various grassland studies of the site and the mitigation lands. Although there is variability in the methods used in some areas, the conclusions remain more than sufficient to determine similarity to the project’s impacted grasslands. Lastly, Commenters argue that there is uncertainty in achieving the mitigation within LA County. As described above, this comment is irrelevant since there is no intent to restrict mitigation lands to within LA County because, as discussed above, it is not required.

F.8-124: Replying to Response to Comment F.8-124, the comment refers reader to a previous comment regarding lack of wildflower studies. As mentioned above, native bunchgrass was a target species for modeling, because it’s density within an area is the most common definition for native grassland areas. Hence, it was the focus for modeling efforts. However, every wildflower within every sampling quadrant studied within the Project site grasslands, as well as the mitigation lands, was identified and documented and included in the documentation and statistical analysis where appropriate within the various botanical reports and summarized in the Draft EIR.

F.8-125: Replying to Response to Comment F.8-125, Commenters assert that land in Kern County cannot be used to mitigate impacts in Los Angeles County. As the County explains in Consolidated Final EIR, Response to Comment ADD-F.2-39, Commenters ignore that the requirement for the proposed Project to mitigate for impacts to biological resources is based on CEQA mitigation requirements, which appropriately focus on biological resource values and not the jurisdictional boundaries of a local jurisdiction – therefore, the location of mitigation lands in Kern County is irrelevant. Further, preservation of large blocks of contiguous open space lands which connect differing habitat types at a landscape level has been widely endorsed by scientific experts, as well as endorsed by the many state and federal agencies that endorsed the TRCRWA for its proactive approach to voluntary advance conservation in anticipation of very limited future development activities. The Project site is at the very northern border of Los Angeles County and is immediately adjacent to the areas within Kern County in the Mitigation Preserve and have a high degree of similarity in biological resources, which is the highest priority for the County when determining appropriate mitigation lands per CEQA Guidelines.

Commenters also assert that use of lands already within a conservation easement is inappropriate. Please see Response to Comment F.8-181 The WCB conservation easement areas shall remain part of the open space mitigation lands for the Project, but MM 7-10 was revised in the Final EIR to clarify that these areas are available only for enhancement, restoration, and creation mitigation, and not for
preservation. Additionally, as discussed in the responses to Comments B.4-17, B.4-43, B.4-60, B.4-63, F.3-12, F.3A-19, F.7-22, F.8-10, F.8-119, F.8-121, F.8-123, F.8-124, F.8-125, F.8-128, and G.12-3, with the addition of the new mitigation preservation lands, the 2:1 preservation ratio is met without enhancement activities on WCB lands.

_F.8-128:_ Replying to Response to Comment F.8-128, the comment states that the Ranch-Wide Management Plan is a grazing plan and does not prioritize conservation of resources over grazing. The comment is incorrect. The RWMP includes extensive conservation measures which are described in the plan and summarized in the FEIR in various response to comments such as B.4-60 which explains that the plan includes BMPs for grazing, including Residual Dry Matter targets, and weed management, including invasive plant mapping and targeted removal actions. The RWMP includes standards for management of the grasslands areas that will preserve the grasslands in perpetuity. The RWMP has been submitted for review and approval to CDFW and USFWS, as applicable. The RWMP provides a comprehensive framework, with the context of the Ranch-Wide Agreement (TRCRWA), for the effective preservation and management of the preserved open space lands located on Tejon Ranch, including the mitigation lands for the Project site. Response to Comment A.2-4, B.4-35 and ADD-F.2-24: also discusses specific Conservation Activities listed within the RWMP which clearly indicate the Plan’s intended goals to preserve native plant and wildlife resources. Also note that grazing is intended to be contused specifically for the purposes of retaining native grassland composition as described in B.4-75.

The comment also states that mitigation lands for the TUMSHCP cannot be used for mitigation for the proposed project. This assertion is incorrect and there is no reasoning provided to further respond to. Lastly, the comment states that MM 7-1 defers mitigation by requiring County approval of a future plan prior to vegetation clearing or grading. Please see Response to Comment F.8-34 which carefully presents case law and reasoning for the adequacy of mitigation that included requirements for plan preparation, inclusive of specific performance standards. Please also see Response to Comment F.8-173.

_F.8-141:_ Replying to Response to Comment F.8-141, the comment states that biological monitoring requirements during construction have been imprudently rolled back to require an Authorized Biologist be on call and this should be reversed in order to quickly and appropriately manage any natural resources conflicts for the life of the project. Changes made to MM 7-6, including the use of the “Authorized Biologist” and their role are based on response to USFWS comments such as A.3-3, A.3-6 and CDFW comments such as B.4-21. The Please also see response to these comments.

_F.8-144:_ This comment incorrectly states the findings of the FEIR regarding the golden eagle. The FEIR found the loss of golden eagle foraging habitat associated with Project implementation to be an adverse impact but less than significant (Page 5.7-150). As stated in Response to Comment F.8-144, golden eagle territories are very large. One territory may contain up to 14 nests (Kochert et al. 2002). Only one nest is used per season, but which one and what part of the territory will be used as primary breeding areas depends largely on prey availability. Unoccupied or “vacant” territories are often used by immature eagles not yet of breeding age (Driscoll 2010). Since there is no time-frame associated with the prohibition of rodenticide use on the Project site, it is in effect in perpetuity (please see also Final EIR, Response to Comment B.4-16).

_F.8-154:_ Replying to Response to Comment F.8-154, the comment states that it is unclear who would be checking to confirm that all dogs and cats are microchipped when entering the site and this is an example of a not likely to be enforced mitigation which will ultimately fail. Per CEQA, it is reasonable...
and foreseeable to assume the residents will comply with mandates, and mitigation is fully enforceable.

**F.8-163**: Replying to Response to Comment F.8-163, the comment states that MM 7-2 includes a typo. The commenter is correct. It is recommended that the County change the word “borrows” with “burrows”.

**F.8-166**: Replying to Response to Comment F.8-166, the comment states that the FEIR does not provide data supporting Pronghorn use areas. Response to Comment B.4-34 refers to the additional pronghorn supplemental data which is included as a map in an attachment to the document. Please see Response to Comment B.4-34 and Exhibit B.4-34. New exhibits are included in Section 3.0, Draft EIR Clarifications and Revisions, of the Final EIR. The pattern of use derived from the Conservancy data and shown on the data map is consistent with the Draft EIR and shows minimal on-site use and far greater use of areas immediately northeast of the site within the off-site Mitigation Preserve lands. Furthermore, the areas where pronghorn are detected on-site are predominantly within the on-site Mitigation Preserve in the northwest portion of the site. Please also see Final EIR, Response to Comment B.4-36.

**F.8-170**: Replying to Response to Comment F.8-170, the comment states the Project site still meets the criteria for designation of SEA and that the FEIR leads the reader to believe that there is a hierarchy to the SEA criteria which is not true. The comment continues by stating that the County should exercise its discretion and designate SEAs which include the proposed project area. The original SEA designations within the area only included the southern edge of the site and was clearly intended to represent the woodlands in the foothills. More recent revisions as part of General and Area Plan updates, have included expanded versions of SEAs designation which encompassed various portions of the project site. The final SEA designation in the area reflects an expanded SEA in the area which encompasses substantially increased portions of the Project site. The boundaries of the final include areas which meet the designation criteria in the region.

**F.8-172**: The comment states that within Response to Comment F.8-172, the analysis in the Antelope Valley RCIS provides additional data on the biological and ecological importance of the proposed Centennial site to current and future conservation mitigation goals in northern Los Angeles County. The Antelope Valley RCIS has been considered and evaluated within the Final EIR as discussed in Response to Comment F.9-2. The RCIS does not provide any new biological information which would alter the EIR impact analysis in any way, and the comment does not provide any further specifics to refer to.

**F.9-2**: Commenter's response is noted. However, it does not question the accuracy or sufficiency of the EIR, and no further response is required.

**Response to III. “Fire Risk Analysis and Fire Safety Measures are Inadequate”**

Commenters’ assertion that the Project’s fire risk analysis and mitigation measures are inadequate is incorrect, for the reasons explained below in response to Commenters’ more specific assertions.

**Response to III.A. “The FIER Fails to Adequately Assess the Potential Impacts of Placing the Proposed Project in an Area That Has a History of Burning and Improperly Defers Mitigation”**

Commenters describe the fire history of the Project site and the surrounding area and observes that the EIR does not specifically mention previous off-site fires by name. To the extent Commenters
intend to assert that this has resulted in deficient analysis of the Project site and its potential fire risk, Commenters are incorrect. As noted in the EIR, fire history, and the potential for flames and embers to threaten buildings, has been taken into account in the Project site’s Fire Hazard Severity Zone designation. (Draft EIR, page 5.3-33) The EIR also acknowledges that wildland fire risks on the site are very high during windy seasons, and connects this to the statement that 31 wildfire over 100 acres in size have occurred within 5 miles of the site from 1964 to 2015. (Id., pages 5.3-33, -34.)

Commenter asserts that Project impact avoidance is inappropriately limited to fuel modification requirements. However, Commenters have chosen one sentence in isolation rather than looking at the entirety of the EIR analysis. The Draft EIR evaluates the Project’s potential fire safety impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a VHFHSZ, (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The potential for wildland fire hazards would exist at the wildland/urban interface due to (a) the presence of brush; (b) increased human activity; and (c) the increased potential for fires due to accidental and arson-related causes. (Draft EIR, pages 5.2-35, -36.) CAL FIRE classifies a zone as having a moderate, high, or very high fire hazard based on a combination of how a fire will behave and the probability of flames and embers threatening buildings. As explained in the Draft EIR, current characteristics of the Project site that contribute to its hazard designation include (1) limited access, (2) lack of existing adequate fire flows, (3) topography, and (4) types of vegetative cover. These characteristics would be addressed as the Project site is developed. (Draft EIR, page 5.3-35.) The Draft EIR determines that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under the applicable thresholds of significance. This determination, however, does not rely solely upon implementation of MM 3-9 or other mitigation measures. Rather, the Draft EIR concludes that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protections services, including but not limited to MM 3-9. For further discussion, see Draft EIR Section 5.3, pages 5.3-35 to 5.3-39.

Commenters also argue that the EIR’s failure to provide the exact Fuel Modification Plan is improperly deferred mitigation. Commenters are incorrect. As a general matter, mitigation plans are not required to be circulated with the EIR as long as the mitigation measure identifies the criteria the lead agency will apply in determining that the impact will be mitigated – this type of approach is consistent with CEQA, which permits the formulation of detailed plans at a future date as long as there is a specified performance standard and identified range of feasible measures that may be implemented to achieve the performance standards and meet mitigation requirements. (CEQA Guidelines § 15126.4(a)(1)(B).) The EIR and Specific Plan provide sufficient detail regarding the preparation and approval of the Fuel Modification Plan, as the County has addressed in Final EIR Response to Comment F.8-63.

Commenter demands that the EIR include specific analysis of future wind patterns on the Project site, noting that climate change will likely affect them. Such analysis is unduly speculative at this time, and CEQA does not require As noted in the EIR, during the approximately 20 years of Project buildout, applicable Fire Codes, standards, and guidelines will likely be continually updated by State and
County agencies as the knowledge gained from past fires is increased; these updated code requirements, as finalized through discussions with the LACFD, would be applied to subsequent development phases of the Project to ensure that Project development continues to meet evolving standards to ensure impacts are less than significant, including with regard to evolving Project site conditions during buildout. (Draft EIR, page 5.3-37) Commenters provide no evidence to support the assertion that CEQA requires a speculative analysis of future wind patterns, and no further response is needed. See also the Response III.C, below, for further discussion of CEQA’s requirements for climate change related analysis.

Lastly, Commenter points out that in the Final EIR, the County notes that the vast majority of Los Angeles County is subject to a fire hazard severity zone, and implies that the County has avoided its responsibility to analyze Project impacts by relying on this fact. However, this is clearly not the case. The EIR thoroughly and appropriately analyzes Project-specific impacts and identifies feasible mitigation to reduce impacts to a less than significant level. The County noted that much of Los Angeles County is designated a fire hazard severity zone to underscore the fact that such designations are not meant to prohibit all development. Rather, they are intended to help limit wildfire damage to structures through planning, prevention, and mitigation activities/requirements that reduce risk. They are used to designate areas where California’s wildland urban interface building codes apply to new buildings, they can be a factor in real estate disclosure, and local governments consider fire hazard severity in the safety elements of their general plans.

Response to III.B. “Fire Safety Measures and Emergency Response Plans are Inadequate and Do Not Mitigate Fire Impacts to Less Than Significant"

Commenters first note that public safety issues are often exacerbated by unreliable infrastructure. To the extent this refers to the Project’s physical infrastructure, the Project will not have this problem. Conversely, the Project site is bisected by SR-138 and would provide 5 access points to SR-138, and is located approximately one mile east of I-5. (Draft EIR, page 3-1.) It has been sited and designed to provide appropriate fire service access and to provide multiple points of entry and exit for residents, and a comprehensive vehicular and non-vehicular circulation system throughout the Project site. (Id., pages 4-6, 4-32 to -34.) This includes 327 acres of land that have been designated Right-of-Way, and will be developed with the Project’s internal roadway system of arterials and collectors. (Id., page 4-5.) The design of the Project’s internal circulation system would implement the County’s Fire Code standards, as applicable, regarding access (e.g., roadway widths, fire hydrant placement, length of single access streets, cul-de-sac dimensions, turning radius, street parking restrictions) (see Section 5.10, Traffic, Access and Circulation, for additional discussion of roadway design; see also the Mobility Plan described in Section 3.2 of the proposed Specific Plan). Further, the Northwest 138 Improvement Project, whose early phases will include operational and safety improvements, including intersection improvements, shoulder widening, and curve corrections, will improve safe access in the Project region. (Consolidated Final EIR, Response to Comment ADD-F.10-5.) The Project will also fund all necessary roadway and highway improvements to reduce Project-related impacts to a less than significant level, further ensuring safe access. (Draft EIR, Section 5.10, Traffic, Access, and Circulation, under Thresholds 10-1 and 1-2, in accordance with the MMRP at MMs 10-3 and 10-4.)

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15 Id.
Commenters lament the lack of a “Fire Protection Plan,” but provide no evidence to support that the Project’s analysis and mitigation are insufficient or that such an additional plan is necessary. The Project does not “only” require an Emergency Response Plan, as is further discussed above in the Response to III.A. Commenters also assert that the Emergency Response Plan required by MM 3-7 must be circulated with the EIR. However, CEQA does not require this, and inclusion of such a detailed plan would be premature and speculative at this time. Per MM 3-7, the Applicant is required to prepare and circulate an Emergency Response Plan, which shall be updated as needed, for each Tentative Map, and distributed to each purchaser or tenant of each Project property – the plan must be submitted to and approved by the County Fire Department and/or the County Sheriff’s Department, per the MMRP. Additional CEQA compliance demonstration will be required at the Tentative Map stage. Commenters also seem to assert, without support, that implementation of the Emergency Response Plan and the County’s evacuation procedures would be inadequate. Such assumptions are unduly speculative. Further, the Applicant notes that the County recently conducted a successful, massive evacuation during the Woolsey fire in Malibu, California, in November, 2018. There is no evidence to suggest that the Project’s evacuation response would be insufficient, and no further response is needed.

Commenters note the resident education is critical. The Project requires the circulation of the prepared Emergency Response Plan to all owners and tenants, and per MM 3-9, the Fuel Modification Plan requirements will be communicated to and required of all residents and business owners in recorded Covenants, Conditions, and Restrictions (CC&Rs) or disclosure statements, which will identify their responsibilities. Per the County’s Code requirements, structures and fuel management practices must comply, and these areas must be maintained. (County Fire Code Section 325.2.) CEQA does not require a lead agency to assume that Project residents will decline to follow legal mandates and CC&R requirements. Commenters also note that fire-resistant structure features reduce risks. The Project incorporates such features. The County of Los Angeles’ stringent standards for appropriate building design and materials would apply to the Project, including requirements for all roof coverings to be of fire retardant materials, prohibition of wood-shingle and wood-shake roofs, construction to prevent intrusion of flames and embers, firestopping with approved materials, appropriate ventilation openings, tempered glass and/or fire-resistance-rated windows and doors, spark arrestors, and required maintenance of cleared brush and vegetation. The Project’s proposed Specific Plan further ensures appropriate building placement and design by requiring that the Los Angeles County Fire Department review all Project tentative tract maps and amendments. (Specific Plan, pages 4-12, -14) Commenters suggest that the lack of external sprinklers makes the Project’s mitigation insufficient. However, the EIR supports its analysis and identification of feasible mitigation to reduce impacts to a less than significant impact, and the Commenters provide no evidence that external sprinklers are necessary to ensure less than significant impacts.

Response to III.C. “The FEIR Fails to Adequately Assess or Mitigate the Impact of Human Activity and Climate Change on Wildfire Risk”

Commenters acknowledge that the EIR discusses potential wildfire hazard from increased human activity and increased ignitions (Draft EIR, page 5.3-36), but allege that Project utility underground requirements are insufficient. As noted by Commenters, transmission line accidents have caused recent, large fires in California. The Project will in fact ensure that Project-related utility transmission lines are undergrounded, to avoid this potential source of fire. SCE maintains overhead 66-kV transmission lines and 12-kV distribution lines running parallel along the north side of SR-138. Additionally, there are distribution lines that extend northeast from the existing Bailey Substation area to the Oso Pumping Plant and north from SR-138 along National Cement Plant Road to the National Cement Plant. The existing lines to the Oso Pumping Plant run through the Open Space north
The existing 66 kV lines (overhead or underground) along SR-138 would be extended to the proposed Centennial Substation site. This substation would convert the incoming 66 kV to outgoing 12 kV/6.9 kV, which would then be distributed to the Project site. The extension of the 66 kV facilities would either be in or out of the proposed roadways. SCE would require easements or joint-use easements for these facilities. The 12 kV/6.9 kV distribution facilities would be extended underground within the roadways.

As discussed on Draft EIR pages 4-66 and 4-67, and shown on Exhibit 4-17, the Project would also involve the installation of new dry utility corridors consisting of joint and sole electric, natural gas, telephone, and cable television facilities within the roadway rights-of-way. The new systems would be installed underground within proposed roadways. It would be necessary to install a distribution transformer at the Bailey Substation to carry sufficient load to the Project. The extension to the Project could be overhead on the existing pole line paralleling the north side of SR-138 or by way of a temporary pole line constructed within the Project limits around the north side of Quail Lake to reach the initial development phases of the Project. However, once the boundary of the initial phase of development is reached, any overhead facilities would be placed underground and run throughout the Project site. As the Project develops on the west side, the temporary overhead lines would be placed underground to accommodate the construction phasing. The new utility corridors would be installed underground within proposed roadways and would be constructed in advance of the land uses that require the facilities.

Commenters then assert that the EIR is inadequate because it fails to go on to assess or mitigate the impacts of increased wildfire risks associated with climate change, on the Project itself. This is an example of a potential future environmental impact on the Project, rather than the Project’s impact on the environment. The latter requires analysis per CEQA, but the former does not. As the California Supreme Court recently confirmed, CEQA does not generally require an analysis of entirely external influences on a project. (California Bldg. Indus. Ass’n. v. Bay Area Air Quality Mgmt. Dist. (“CBIA”) (2015) 62 Cal. 4th 369, 386.) Although climate change is impacting the environment in a variety of ways, these impacts are occurring independent of the proposed Project, and will happen regardless of whether the Project is implemented. As discussed below, with certain exceptions, the interaction between climate change impacts and Project impacts cannot be predicted with any degree of certainty. As CBIA affirmed, the EIR for the proposed project need not analyze impacts that would occur independent of the project.

Although there is general consensus among scientists that climate change is occurring and will have actual effects on biodiversity, ecosystem function, species, and habitats, there is currently a high degree of uncertainty at a community, ecosystem, or regional level. Notwithstanding the global (rather than site-specific or even state-specific) nature of climate change issues, the EIR does expressly disclose the risks associated with climate change, in EIR Section 5.21. However, the precise parameters of how these risks will interact with development resulting from this or any single development project at any particular location including the Project site cannot be predicted with certainty based on existing science. Where climate change risks may affect the development brought to the project, these topics are addressed in the EIR. In contrast, with respect to impact areas where specific risks are not associated with the project area, a detailed analysis is not required. Climate change is analyzed in the EIR when the interaction between the given risk and climate change is sufficiently well-understood to permit analysis. Estimates of climate change impacts on the future incidence and intensity of wildfires are subject to ongoing refinement and significant uncertainty. The precise relationship between climate change and wildfire risk is not understood to a degree that enables a project-specific CEQA analysis of the interaction of climate change and wildfire risks created by the project in this specific location. Rather, the mitigation measures required for the
project are sufficiently protective and flexible to protect against increased risks of even severe wildfires (regardless of the cause of such wildfires), including the risks that occur in wildland-urban interface areas, that may result from climate change. Notwithstanding the variable effects climate change is expected to have with respect to wildfires, in compliance with CEQA including Section 15126.2(a) of the CEQA Guidelines, the EIR recognizes the risks associated with exposing people and structures to wildfire and includes a thorough analysis of these potential impacts as well as a detailed mitigation plan to address these risks.

**Response to III.D. “The FEIR Fails to Adequately Assess and Mitigate the Potential Health and Air Quality Impacts of Increased Unnatural Smoke Levels Due to Increased, Human-caused Ignitions”**

Commenters likewise assert that the EIR is inadequate because it does not study the impacts of smoke from potential wildfires on Project residents. Such analysis is unduly speculative at this time because the impact is uncertain and unpredictable, and therefore not reasonably foreseeable, and CEQA does not require it. Further, as discussed above in Response to III.C., the court in *CBI-A* affirmed that the EIR need not analyze impacts that would occur independent of the project, and CEQA does not generally require an analysis of entirely external influences on a project, but rather the Project on the environment. Finally, this argument relies Commenters’ assumption that the Project will cause significant wildfires, which as documented in the EIR, is not the case – the EIR incorporates appropriate mitigation and the Project is subject to applicable regulatory requirements to ensure impacts are less than significant impacts.

**Response to III.E. “The FEIR Fails to Adequately Assess and Mitigate the Impact of Increased Wildfires on Fire Protection Services and Utilities”**

Commenters next assert that the EIR is insufficient because it does not analyze the impact of potential wildfires on the well-being of firefighters and first responders, and the economic costs of firefighting. Like Commenters’ previous argument, this argument relies on Commenters’ assumption that the Project will cause significant wildfires, which as documented in the EIR, is not the case – the EIR incorporates appropriate mitigation and the Project is subject to applicable regulatory requirements to ensure impacts are less than significant impacts. Further, analysis of impacts on firefighters would be speculative and tenuous, and is therefore not required by CEQA. The economic cost of fighting large wildfires is likely a social impact, and not a physical impact on the environment that must be considered under CEQA. As disclosed in EIR Sections 5.16 and 5.17, the Project is required to provide for foreseeable infrastructure and service costs, and ongoing Project site property taxes would continue to fund reasonably foreseeable services.

**Response to IV. “The FEIR Still Fails to Analyze of Mitigate the Project’s Traffic Impact”**

Commenters do not accurately describe the traffic analysis and mitigation approaches utilized in the FEIR, all of which fully comply with CEQA requirements. As discussed above in Response to I., the Project Description is not deficient and does not adversely affect the conclusions of the traffic analysis or the traffic and circulation mitigation measures included in the MMRP.

First, as discussed in the FEIR, during the public review and comment period for the Draft EIR, Caltrans identified a preferred alternative (“Alt 2”) for improvements to State Route (SR) 138 in the Northwest State Route 138 Corridor Improvement Project (“NW SR-138 project”) Final EIR/EIS (“NW SR-138 FEIR”). In July 2017, Caltrans submitted a comment letter requesting that the Project traffic analysis discuss and incorporate the Alt 2 alignment identified in the facilities to be consistent with the NW SR-138 FEIR. In response, a Centennial Specific Plan Supplemental Traffic Study (STS)
was prepared and is attached as Appendix 5.10-C of the FEIR. As in the Draft EIR, and in accordance with CEQA, the STS considers potential Project impacts under existing and future (cumulative) traffic conditions. Potential impacts with the Alt 2 alignment were evaluated using the Highway Capacity Manual (HCM) methodology utilized in the certified NW SR-138 FEIR. Both the Project FEIR and the NW SR-138 FEIR use the North County Sub-Area Model to evaluate traffic conditions in north Los Angeles County. The FEIR utilizes a more recent version of the model that was updated by Los Angeles County to reflect the Antelope Valley Area Plan (AVAP) approved by the County in June 2015. The STS also uses the traffic forecasts from the updated North County Sub-Area Model provided by the County to analyze potential Project and cumulative impacts to reflect the most current information available regarding traffic conditions in the North County region.

The FEIR analyzes potential Project impacts with improvements required to accommodate the full buildout of the Project and with the implementation of the Alt 2 alignment of SR 138 identified by Caltrans in the certified NW SR-138 FEIR. Potential Project impacts are evaluated: (a) utilizing the current SR-138 facilities; (b) utilizing the Alt 2 facilities described in the NW SR-138 FEIR; and (c) utilizing the Alt 2 facilities and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout. The FEIR analysis shows that, using the methodology Caltrans utilized for the certified NW SR-138 FEIR

- Under interim cumulative traffic conditions, the current SR-138 facilities would accommodate approximately 10 percent of the Project’s full buildout traffic without adversely affecting applicable LOS standards.\(^ {16} \)

- Under existing traffic plus Project conditions, the implementation of Alt 2 would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.\(^ {17} \)

- Under interim cumulative traffic plus Project conditions, the implementation of Alt 2 would accommodate approximately 75 percent of the Project’s full buildout traffic without adversely affecting applicable LOS standards.\(^ {18} \)

- Under long-range cumulative traffic plus Project conditions, the implementation of Alt 2 and additional SR-138 improvements would accommodate the full buildout of the Project without adversely affecting applicable LOS standards.\(^ {19} \)

The FEIR further evaluates potential Project impacts to Interstate-5 (I-5), SR-14, and SR-99 facilities using the volume to capacity methodology specified by the Congestion Management Plan for Los Angeles County and the Project’s potential impacts using the Caltrans’ recommended HCM methodology. HCM calculations were prepared for 62 locations, including freeway segments in advance of and after major system interchanges as well as representative locations between major system interchanges with the greatest potential to be affected by congestion. Under existing plus Project conditions, the FEIR analysis demonstrates that all applicable highway segments, intersections and ramps would operate at acceptable LOS levels.\(^ {20} \) Under cumulative plus Project conditions with mitigation, the Draft EIR and the STS show that almost all applicable highway

\(^ {16} \) Final EIR Appendix 5.10-C, Tables 3-3 and 3-4  
\(^ {17} \) Id., Appendix 5.10-C, Tables 3-1, 3-2 and 3-9  
\(^ {18} \) Id., Appendix 5.10-C, Tables 3-5 and 3-6  
\(^ {19} \) Id., Appendix 5.10-C, Table 3-7, Tables 3-8 and 3-9  
\(^ {20} \) Id., Appendix 5.10-C, Table 4-1
segments, intersections and ramps would operate at acceptable LOS levels. At certain study locations, such as the Grapevine grade segment of I-5, HCM-based LOS standards would not be achieved because of topographic conditions, lane and speed controls, and other localized conditions but would improve under cumulative with Project conditions with the implementation of the Project MMs. Consequently, the FEIR traffic analysis, which incorporates the SR 138 improvements analyzed by Caltrans in the certified NW SR-138 FEIR, shows that the Project will not result in a significant impact under cumulative with Project conditions with mitigation.

Contrary to Commenters’ assertion, the Project analysis does not assert that “trip capture rates” were “affirmed” in the “AVAP Litigation.” The FEIR correctly and accurately states that both the Project analysis and the certified Caltrans NW SR-138 FEIR analysis utilize the North County Sub-Area Model which was also used by the County to evaluate AVAP impacts in the AVAP FEIR. The FEIR also correctly states that several parties, including certain parties listed on the comment letter, challenged the legal sufficiency of the AVAP FEIR. The parties’ challenge was rejected and the AVAP FEIR was upheld by the Superior Court. Consequently, as accurately described in the FEIR, the Project analysis is based on an updated version of the same traffic model used in the AVAP FEIR that was upheld by the Court.

As discussed in the FEIR, the updated North County Sub-Area Model provides estimates of internal trips and tripends for development and other projects within the North County region, including the Project Area. (A “trip end” refers to a trip start or destination point. An internal trip is a trip that starts or begins in the Project site, such as from a residence. A “trip” includes a starting tripend and ending tripend. An internal trip is a trip that both starts and ends within the Project site). The model projects that about 48 percent of the Project’s total average daily trips (ADT) at buildout will be internal, and 52 percent will be external to the Project site. The model also projects that about 65 percent of the Project’s full buildout total average daily tripends (the start or ending of a trip) will be internal to the site, and 35 percent will be external to the site.

Commenters incorrectly suggest that certain American Community Survey (ACS) data summarized in the FEIR pertaining to internal and external “work trips” in some manner contradicts the “total” internal and external trips projected by the model (see ACS tables in the Consolidated FEIR, Vol. 2, pages 2-563 and 2-565). As explained in the FEIR, most of the Project trips will be generated by residential land uses—not “work trips”—and an average single-family residential unit generates approximately nine “home-based trips” per day. Only about two of these nine trips—about 22 percent of all trips—are work trips related to travel directly to and from work. The remaining trips—about 78 percent of all trips—are from travel between residential units for a non-work activity such as school, shopping, or recreation. As noted in the FEIR, the percentage of internal trips and tripends for “non-work” activity in locations such as the Project which provide schools, recreational facilities and shopping opportunities that are relatively far from other options is generally higher than for work-related trips. The ACS data cited in the comment letter shows that the “total” internal trip rate for the Project that results from the North County Sub-Area Model is approximately the same as the average internal trip rate for “work commutes” alone in similarly isolated communities in California (48 percent). Since more daily trips in a community are related to non-work purposes, and the percentage of non-work internal trips is typically higher than for employment purposes, the work trip data derived from the ACS, which is more heavily weighted towards external trips, indicates that the North County Sub-Area Model internal and external trip estimates for the Project are reasonable.

21 Id., Appendix 5.10-C, Table 4-2
22 Id., Appendix 5.10-C, Section 5
The comment letter does not question the accuracy of the North County Sub-Area Traffic Model, or provide evidence that the model is unreliable.

The FEIR also provides a full and complete summary of projected Project trip lengths and speeds that does not simply utilize an average value. In the same section cited in the comment letter (Consolidated FEIR, Vol. 2, pages 2-565 to 2-565), the FEIR states that, “The average Project trip length is derived from the updated North County Sub-Area Model and is about 25.5 miles. The model indicates that internal trips, which account for 48 percent of the Project’s total trips, will average about 3.4 miles in length. External trips, which account for 52 percent of the Project’s total trips, will average about 45.9 miles in length. These estimates are consistent with internal trip end projections from applicable traffic models for the Lancaster/Palmdale and Santa Clarita Valley areas. The model results are also consistent with available information regarding internal, external and travel time to work from the 2011-2015 ACS 5-Year Estimates for 11 communities that with similar geographic characteristics and a comparable average workforce as the Project.” Consequently, the FEIR specifically provides the information that the comment letter inaccurately suggests was “misleadingly” omitted.

Contrary to the comment letter, the Project mitigation measures are fully enforceable, including in conjunction with the County’s review and approved of tentative tract maps (TTMs) required for each phase and component of the Project. As discussed in the FEIR, the TTM serves as the implementing mechanisms for Project land uses, and all TTM land uses must be consistent with the Centennial Specific Plan. Chapter 4 of the Specific Plan describes the processes and procedures for implementing the Specific Plan, including the processes and procedures for subsequent Project approvals such as future TTM. Chapter 4 of the Specific Plan also establishes mechanisms that allow for flexibility in the development of the Project to respond to market conditions over the anticipated buildout of the Project while ensuring consistency with the purpose and intent of the Specific Plan. Specific Plan Section 4.5.2, Discretionary Conformance Review, provides that significant modifications of the Specific Plan, including land use adjustments under Specific Plan Section 4.6, (Specific Plan Adjustment, Transfer, and Conversion Regulations) are subject to discretionary review and approval, including additional CEQA analysis as applicable. Section 1.4 of the Specific Plan provides that the Specific Plan constitutes the land use regulations (zoning) for the Project and that subsequent or concurrent approvals such as parcel maps, tract maps, site plans, and use permits must be consistent with the Specific Plan. Chapters 1, 2, 3, and 4 of the Specific Plan will be adopted by ordinance and are subject to the penalty provisions of the Los Angeles County Code.

All subdivision map, variance, conditional use permit, deviations from standards, building, or other permit conditions imposed pursuant to the Specific Plan will also be subject to the penalty provisions and citation procedures of the County Code. As discussed in the California Bureau of Real Estate Reference Guide, the California Subdivision Map Act sets forth the conditions for approval of subdivision maps and requires enactment of subdivision ordinances by which local governments have direct control over the types of subdivision projects to be undertaken and the physical improvements to be installed. The primary objectives of the Act include the coordination of subdivision design (lots, street patterns, rights-of-way for drainage and sewers, etc.) with applicable plans and insuring that public improvements are properly completed to avoid undue burdens on the taxpayers of the community. The Los Angeles County Subdivision Ordinance was enacted in accordance with state law, and the approval of each future TTM for the Project must ensure

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23 Government Code § 66410, et seq.
compliance with the Specific Plan and that public facilities, including transportation improvements that meet Project demand under forecasted cumulative conditions, are implemented without resulting in undue burdens to County and other taxpayers.

The MMRP requires that Project traffic conditions and impacts be analyzed in conjunction with each TTM application. MM 10-2, for example, requires a traffic study prepared by a Traffic Engineer or Civil Engineer licensed in the State of California to the satisfaction of the County be submitted with each TTM application for review by the County. MMs 10-25 and 10-26 require that the Project Applicant confirm that all Specific Plan traffic-related requirements, including the creation and operation of a Transportation Management Agency, the implementation of facilities and measures that encourage non-automotive transportation, and the implementation of Transportation Demand Management measures, have been implemented prior to County approval of a TTM. Consequently, Project and local traffic conditions and the need for the implementation of applicable mitigation measures in the MMRP that identify improvements to local and state highway facilities will be evaluated as the Project is developed and TTM's are submitted for County review and approval. If the Project traffic evaluated in a TTM application deviates significantly from projected levels, the County has the authority deny the approval of any new TTM's and additional development until Project conditions are verified to be within projected levels, or a new project application, with new CEQA analysis, is reviewed and approved.

While the development of specific future phases and components of the Project will be based on the state of the economy, market demand for uses on the site and the timing of regional and off-site infrastructure, the Project land use approval process required by the Specific Plan, the implementation of the Subdivision Map Act by the County, and the MMRP ensure that future development will occur in a balanced pattern. Contrary to the comment letter, Project development may only proceed after County approval of future TTM's. The TTM review and approval process requires an environmental evaluation to confirm that the Project's interim buildout (including the interim buildout of different categories of uses) does not cause any new or more significant adverse environmental impacts that were not evaluated in the FEIR. The MMRP requires that traffic studies be prepared and that Specific Plan transportation measures be confirmed in conjunction with each TTM application. In the event that Project development is “unbalanced” as suggested in the comment letter, the environmental and traffic analysis required for each TTM would find that Project-related traffic differs from the traffic volumes and patterns considered in the FEIR.

In summary, the comment letter provides no new information concerning the FIER analysis of Project traffic impacts, incorrectly summarizes the Project’s analysis and methodology, and incorrectly suggests that the required mitigation measures and TTM review process will not avoid new or significantly more severe transportation and circulation impacts than analyzed in the FEIR. Project compliance with all applicable mitigation measures and the Specific Plan, including the Mobility Plan, and consistency with the analysis in the FEIR, will be confirmed during the approval process for each TTM. If the County determines that approval of a TTM would result in new or more severe significant impacts than evaluated in the FEIR, CEQA requires additional environmental analysis, and consideration of additional feasible mitigation measures to reduce significant impacts prior to subsequent approval.

The comment letter unaccountably appears to contend that the Project development agreement could “constrain” the County’s discretion to require new review to the criteria in Public Resources Code section 21166. Section 21166 and corresponding CEQA Guidelines section 15062, however, list the circumstances under which additional review can be required by a lead agency. Compliance with CEQA laws and regulations cannot ”limit” the County’s ability to implement CEQA.
Response to IV.A. “The FEIR Still Fails to Analyze VMT as a Threshold of Significance”

Contrary to the comment letter, the Project is not required to utilize the pending, new vehicle miles traveled (VMT) significance criteria in the CEQA Guidelines. First, the VMT criteria have been developed as part of a formal CEQA rulemaking process that has not yet been finalized. In addition, if adopted as currently drafted, new CEQA Guidelines section 15064.3(c) specifically provides that the VMT criteria only apply “prospectively as described in [CEQA Guidelines] section 15007. A lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide.” CEQA Guidelines section 15007(b)-(c) states that “[a]mendments to the Guidelines apply prospectively only…. If a document meets the content requirements in effect when the document is sent out for public review, the document shall not need to be revised to conform to any new content requirements in Guideline amendments taking effect before the document is finally approved.” The Project FEIR was circulated for public review and comment prior to the finalization of the proposed VMT criteria in the CEQA Guidelines, and by its terms these revisions would only apply to projects statewide after July 1, 2020.

Contrary to the comment letter, the FEIR does analyze and discuss the Project’s VMT in conjunction with the analysis of potential air quality and greenhouse gas impacts. Table 5.21-9 of the Consolidated FEIR (Vol. 3, page 4-393) provides a summary of VMT generated by each Project land use, including trips by residents, workers, customers, and delivery vehicles. The trip generation rates used to calculate mobile source criteria air quality and greenhouse gas emissions were adjusted to be consistent with the trip generation data provided in the Project traffic impact analysis. Consequently, although the proposed CEQA Guidelines revisions are inapplicable by their terms, the FEIR in fact discloses and analyzes the Project’s VMT.

Response to IV.B. “The FEIR's Traffic Mitigation is Deferred and/or Unenforceable and Will Result in Unanalyzed Impacts on the Environment”

The comment letter does not accurately describe the Project’s mitigation requirements in the FEIR and MMRP, all of which fully comply with CEQA requirements.

First, the Project is required to pay for all of the direct costs and fair share of all cumulative costs associated with Project-impacts to state transportation facilities. Mitigation Measure 10-3 states that “The Project Applicant/Developer shall seek to enter into a Traffic Mitigation Agreement for Land Development Impacts to California State Transportation Facilities with by and between the Project Applicant/Developer and Caltrans and during the term of such agreement shall comply with the terms and conditions thereof. Compliance with the Traffic Mitigation Agreement shall constitute compliance with the mitigation measures for the Project's traffic impacts on the State highway system. Any required improvements that result from direct Project impacts (i.e., not from cumulative impacts), and are required on Caltrans-owned facilities, shall be implemented through a Traffic Mitigation Agreement. Any required improvements that result from cumulative traffic impacts may be implemented through payment of fair share fees.” Compliance with MM 10-3 is required in the MMRP “Prior to approval of first Tentative Map” for the Traffic Mitigation Agreement and “Prior to Final Map recordation” for any required cumulative impact facility improvements. Contrary to the comment letter, these requirements are not conditional and will be confirmed at clearly defined points in the development process.

The comment letter incorrectly suggests that impacts associated with SR 138 have not been evaluated. As discussed in Section IV, the Project FEIR specifically incorporates the Caltrans preferred alternative for improving SR 138 as identified in the certified NW SR-138 FEIR. Caltrans
prepared and certified the EIR/EIS for the NW SR-138 improvement project, including the “Alt 2” alignment analyzed in the FEIR, in 2017. The FEIR determined that the implementation of Alt 2, and additional improvements to SR-138 that may be required under cumulative conditions with full Project buildout, will not result in any new or more severe significant physical construction and operational impacts than considered in the NW SR-138 FEIR and the Project FEIR. Consequently, there is no requirement to reanalyze these issues.

Contrary to the comment letter, the mitigation measures related to improvements on SR-138 or other state facilities identify measures that would reduce potentially significant impacts at specific locations, such as an offramp or a roadway segment, to less than significant levels. Under the MMRP, the Project is obligated to defray the costs of improvements required to mitigate for both direct Project and the Project's fair share of cumulative state facility impacts. Compliance with these measures is confirmed under the MMRP at the tentative map approval stage for final map recordation phases of development. These measures are mandatory, pertain to clearly identified locations and improvements, do not “defer” mitigation, and are not an impermissible form of “fee-based” mitigation.

Response to V. “The FEIR’s GHG Analysis and Mitigation is Flawed and Must Be Revised”

The Applicant disagrees with this comment’s general assertion that the EIR's greenhouse gas (GHG) analysis and mitigation program is flawed. Other than this comment’s general complaint that EIR's GHG analysis is purportedly flawed, this introductory comment does not identify any specific concerns regarding the EIR and no further response is warranted.

Response to V.A. “Climate Change is a Catastrophic and Pressing Threat to California”

This comment generally summarizes existing climate since and is consistent with EIR section 5.21, Climate Change, and its discussion of the environmental setting. The EIR acknowledges the consensus among leading scientists that without action to reduce GHG emissions, climate change due to global warming will pose a considerable threat to the environment and to human health and society and that CEQA plays an important role in achieving California’s climate goals. The Applicant disagrees with this comment’s general assertion that the EIR's GHG analysis and mitigation program is flawed. Other than this comment’s general complaint that EIR's GHG analysis is purportedly flawed, this introductory comment does not identify any specific concerns regarding the EIR and no further response is warranted.

Response to V.B. “The DEIR and FEIR’s Significance Analysis of the Project’s GHG Emissions in Flawed”

This Comment’s claim that the Project may not rely on the SCAG's RTP/SCS and the County's Climate Action Plan to assess the significance of the Project’s GHG impacts is contrary to applicable law. As explained in EIR Chapter 5.21, in Center for Biological Diversity v. Department of Fish and Wildlife, 60 Cal.4th 204, 219 (Newhall), the Court recognized that “the challenge for CEQA purposes is to determine whether the impact of the project’s emissions of greenhouse gases is cumulatively considerable” and thus significant. To Newhall court also identified various pathways to CEQA compliance for evaluating the significance of a project’s GHG effects, including, but not limited to, (1) assessing project compliance with regulatory programs designed to reduce greenhouse gas emissions, (2) assessing project consistency with a local climate action plan, and (3) assessing project compliance with local climate action plan, and (3) assessing project

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25 Final EIR, Appendix 5.10-C, Sections 2.5 and 3
consistency with a regional sustainable communities strategies. Consistent with this Supreme Court guidance, under Threshold 21-2, the EIR considered whether the Project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs by analyzing the Project’s consistency with (i) the Los Angeles County Community Action Plan, and (2) the South Coast Association of Government’s (SCAG’s) Regional Transportation Plan/Sustainable Community Strategy (SCAG RTP/SCS), the SB 375 SCS applicable to the Project. Despite this comment’s claim to the contrary, this EIR analysis is in full compliance with Newhall and applicable law.

This comment claims that the EIR’s analysis of the Project’s consistent with the RTP/SCS is flawed because the EIR purportedly fails to explain “how the project is consistent with the greenhouse gas policies” of the RTP/SCS. That is not true. As explained in detail in the EIR, the Project is fully consistent with the RTP/SCS’s CARB-approved development pattern designed to achieve the SB 375’s GHG reduction goals for the SCAG region. The RTP/SCS preferred development pattern targets the Project site for significant growth, relying on socioeconomic projections at the level of individually mapped Traffic Analysis Zones (TAZs). In fact, SCAG’s TAZ maps project that over 22,000 new households will be constructed in the Project area by 2035. The RTP/SCS thus anticipates development of the Project site at densities consistent with the Centennial Specific Plan. In addition, the RTP/SCS identifies the Northwest SR-138 Improvement Project (which is partially located within the Project’s boundary and was recently approved by Caltrans) as a major regional highway project needed to improve regional access to opportunities such as jobs, education, recreation and healthcare. Thus the EIR fully explains how the Project is consistent with the RTP/SCS recommended development pattern and transportation programs for achieving the region’s SB 375 regional GHG reduction target. Notably, commenter does not specify any other “greenhouse gas policies” of the RTP/SCS that the EIR purportedly failed to adequately consider.

This comment implies that the Project is not may not be consistent with the RTP/SCS due to purported inconsistencies with the County’s growth projections. This comment is not correct for the reasons explained in Response to Comment F.8-228.

This comment’s complains that the EIR’s analysis of the Project’s consistency with the CCAP is flawed because the CCAP only sets targets through 2020. However, the EIR expressly acknowledges on page 5.21-72, that, “[s]ince the Project has a phased implementation schedule with full buildout beyond the CCAP’s 2020 planning horizon, consistency with the CCAP is only one Newhall compliance pathway used in this Section 5.21.6 to evaluate the significance of the Project’s GHG emissions. However, the Project’s consistency with the CCAP is important for determining the significance of GHG emissions for the current CCAP planning horizon.” This comment also, incredibly, claims that the EIR fails to discuss the Project’s consistency with the 2050 GHG reduction targets, but then admits that this analysis is included in several paragraphs of the EIR. Indeed, as explained in the EIR, the 2017 Scoping Plan recommends statewide targets of no more than 6 MTCO2e per capita by 2030, and no more than 2 MTCO2e per capita by 2050. As explained in the EIR, the Project’s GHG efficiency at buildout is 1.93 MTCO2e per capita, number that is well below the Scoping Plans 2030 and 2050 per capita targets. Commenter does not dispute this analysis.

Response to V.C. “The Mitigation Measures Incorporated in to the FEIR are Insufficient”

The Applicant disagrees with this comment’s assertion that the EIR mitigation program for addressing GHG impacts is inadequate for the reasons explained in Response to Comment F.8-204 and FEIR Vol. 3, Section 4.3. As explained in the EIR, 96% of the Project’s GHG emissions are covered
by Cap-and-Trade and the 48 mitigation identified in the EIR for the reduction of GHG adequately reduce all project GHG emissions to the extent feasible.

**Response to V.D. “Any Reliance on the Cap-and-Trade to Address or Mitigate the Project’s GHG Emissions is Improper”**

Commenter takes issue with the greenhouse gas (GHG) analysis included in the Centennial Specific Plan Final Environmental Impact Report (Centennial EIR). Specifically, Commenter argues that the Centennial EIR improperly relies on the state’s Cap-and-Trade program as CEQA mitigation to reduce 96% of the Centennial Project’s GHG emissions. As explained below, Commenter’s claim is without merit because it is based on factual misrepresentations, misstatements of applicable law, and relies on California Air Resources Board (CARB) staff letter, and a similar commenter letter from the California Attorney General, concerning an unrelated project that are both expressly contradicted by CARB’s own Statement of Reasons for the Cap-and-Trade Program prepared in accordance with Government Code §§ 11346.2(b) and 11346.9(a) (Statement of Reasons). Per CARB Resolution 11-32, which adopted Cap-and-Trade, the Statement of Reasons “presents the rationale and basis for” Cap-and-Trade.

As held by the Supreme Court in *Center for Biological Diversity v. California Department of Fish and Wildlife*, one option available to lead agencies for determining the significance of a project’s GHG impacts is to “assess ... compliance with regulatory programs designed to reduce greenhouse gas emissions from particular,” citing both CEQA Guidelines § 15064.4(b)(3) and CARB’s Statement of Reasons. See (2015) 62 Cal.4th 204, 228-229 (“Newhall”). Subsequently, in *Association of Irritated Residents v. Kern County Board of Supervisors*, the Court of Appeal held that CEQA Guidelines § 15064.4(b)(3) in fact directs lead agencies “to consider the project’s compliance with the cap-and-trade program in assessing the significance of environmental impacts from the project’s greenhouse gas emissions” See (2017) 17 Cal.App.5th 708, 742 (“AIR”).

Consistent with *Newhall* and *AIR*, the Centennial EIR analyzes under Threshold 21-1 the extent to which the project complies with Cap-and-Trade and other regulatory programs for the reduction of GHG emissions, including but not limited to: SB 375 and SCAG’s Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS); Title 24 Building Energy Efficiency Standards; Renewable Portfolio Standards; Los Angeles County Green Building Standards Code; State Model Water Efficient Landscape Ordinance; Low Carbon Fuel Standards; Advanced Clean Cars Program; AB 341 Solid Waste Diversion Requirements. See Centennial EIR at 5.21-48 through 5.21-72. The Centennial EIR concludes that the project will comply with such regulatory programs and that its GHG emissions could therefore be considered less than significant under Threshold 21-1. See id. at 5.21-86. However, the Centennial EIR conservatively concludes that this cumulative impact will be significant and unavoidable because the County has no jurisdictional control or responsibility for GHG reductions in other parts of California, and it has no jurisdiction to enforce statewide implementation of all GHG-reducing regulatory programs with which the Project must comply. See id.

Following publication of the draft Centennial EIR, a new version of the CalEEMod air quality modeling software was released and the 2019 Title 24 Building Energy Efficiency Standards were adopted. In light of these developments, and in order to clarify the Centennial EIR’s GHG analysis, the County prepared the *Updated Greenhouse Gas Calculations for the Centennial Project Final Environmental Impact Report*, which Commenter refers to as “Attachment H.” The *Updated Greenhouse Gas Calculations* report is included in Centennial Final EIR, Volume 3, Section 4.3, but is referenced herein as “Attachment H” so as to maintain consistency with the Comment letter’s nomenclature.
Attachment H compares the quantified Centennial GHG emissions disclosed in the draft Centennial EIR with updated GHG emission calculations that take into account (i) emission estimates calculated in accordance with the new version of CalEEMod, (ii) updated information regarding electric vehicle (EV) adoption rates, (iii) updated Centennial energy and water use emissions based on new Title 24 standards; (iv) revised solid waste GHG emissions based on landfill diversion requirements, and (v) estimated internal and external vehicle trip reductions attributable to Centennial’s single occupancy vehicle (SOV) mitigation measures, which were not quantified in the draft Centennial EIR. In addition, Table 3 of Attachment H evaluates the extent to which Centennial GHG emissions are covered by Cap-and-Trade because they are generated by the consumption of fossil fuels sourced from upstream fuel suppliers that are subject to Cap-and-Trade. As shown on Table 3, Centennial is estimated to generate 157,642 MTCO2E of GHG emission per year. Of these emissions, 150,808 MTCO2E are generated by Centennial's consumption of fossil fuels sourced from fuel suppliers that are subject to Cap-and-Trade (i.e., electricity, natural gas, transportation fuels).

At the heart of this comment is the inaccurate assertion that the Cap-and-Trade Program was never intended to achieve greenhouse gas reductions associated with mixed-use development projects because projects like Centennial are not Cap-and-Trade covered entities. Commenter’s only support for this claim are letters written by CARB staff and the Attorney General that comment on an EIR for the unrelated World Logistics Center warehouse and logistics facility (WLC) proposed in the City of Moreno Valley. Like commenter, CARB and the Attorney General have express the view that the Cap-and-Trade program has no bearing on local land use projects because “the Cap-and-Trade Program ... was never designed to adequately address emissions from local projects.” See CARB Letter at 1. These arguments, however, are directly (and quite clearly) contradicted by both controlling case law and CARB’s Statement of Reasons, as explained below.

In AIR, the Court of Appeal held that CEQA Guidelines § 15064.4(b)(3) authorizes a lead agency “to determine a project’s greenhouse gas emissions will have a less than significant effect on the environment based on the project’s compliance with the cap-and-trade program.” See (2017) 17 Cal.App.5th at 742. At issue in AIR, was an EIR prepared for an oil refinery modification project (Refinery EIR). Id. at 717. The Refinery EIR quantified project emissions by dividing them into three categories: (1) construction activities; (2) “permitted sources;” and (3) “non-permitted sources.” Id. at 736, 740. The permitted sources included direct emissions from the refinery’s stationary operations. Id. at 736. The non-permitted sources “include[d] mobile sources,” as well as “indirect greenhouse gas emissions from electrical power use.” Id. After quantifying the refinery’s total emissions, the Refinery EIR took credit for GHG emission reductions associated with “offsets of the permitted source greenhouse gas increases through cap-and-trade,” as well as for “offsets of electric utility greenhouse gas emission increases through cap-and-trade.” Id. Upon review, the Court upheld the Refinery EIR’s GHG analysis and its reliance on GHG reductions associated with the surrender of Cap-and-Trade compliance instruments. Id. 742-743. On January 31, 2018, the California Supreme Court declined to review the Court of Appeal’s decision in AIR. Accordingly, AIR is settled law.

Commenter, CARB and the Attorney General argue that AIR does not apply to land use projects because land use projects like Centennial and WLC are not Cap-and-Trade covered entities, whereas the refinery at issue in AIR is a covered entity. While it is true that the AIR refinery is a covered entity under Cap-and-Trade, this was not a limiting factor in the AIR decision. To the contrary, the AIR court sanctioned the Refinery EIR’s reliance on GHG reductions associated with Cap-and-Trade compliance by both the refinery (a Cap-and-Trade covered entity) and the refinery’s upstream fuel supplier, PG&E (also a covered entity). See (2017) 17 Cal.App.5th at 735-736, 740 (“[T]he EIR states Pacific Gas and Electric will be required to reduce greenhouse gas emissions at its facilities or to surrender compliance instruments to counterbalance the emission increases associated with increased power
usage. ... Compliance [with Cap-and-Trade] was a factor to be considered and, in the circumstances presented, is part of the substantial evidence supporting the finding that the impact of the [refinery's total] emissions was less than significant.”) Since the holding in AIR extends to Cap-and-Trade compliance by a project’s upstream fuel suppliers, any argument that AIR does not apply in this case merely because Centennial is not itself a Cap-and-Trade covered entity is insufficient. To the contrary, like the refinery in AIR, Centennial’s upstream fuel suppliers are Cap-and-Trade covered entities, a fact undisputed by Commenter. There is no logical reason why, under AIR, the Refinery EIR can legitimately take credit for Cap-and-Trade compliance by the refinery’s upstream fuel suppliers, but Centennial cannot. Accordingly, AIR is controlling law and the Centennial EIR’s reliance on such law is appropriate.

The CARB Letter also argues that local land use projects cannot rely on CEQA Guidelines §15064.4(b)(3) with respect to Cap-and-Trade without substantial evidence demonstrating a rational connection between such projects and Cap-and-Trade. See CARB Letter at 7. However, one need only look to CARB’s Statement of Reasons for substantial evidence that GHG emissions caused by a local project’s consumption of upstream fuel sources are in fact covered by Cap-and-Trade, as recognized by the AIR court. Indeed, the Statement of Reasons explains in unambiguous terms that Cap-and-Trade covers fossil fuel consumption by residential and commercial projects, as follows:

To cover the emissions from transportation fuel combustion and that of other fuels by residential, commercial, and small industrial sources, staff proposes to regulate fuel suppliers based on the quantities of fuel consumed by their customers. ... Fuel suppliers are responsible for the emissions resulting from the fuel they supply. In this way, a fuel supplier is acting on behalf of its customers who are emitting the GHGs. ... Suppliers of transportation fuels will have a compliance obligation for the combustion of emissions from fuel that they sell, distribute, or otherwise transfer for consumption in California. ... [B]ecause transportation fuels and use of natural gas by residential and commercial users is a significant portion of California’s overall GHG emissions, the emissions from these sources are covered indirectly through the inclusion of fuel distributers [in the Cap and Trade program].”

Perhaps Commenter can be excused for not clearly understanding the public policy underlying the Cap-and-Trade program, but the same cannot be said for CARB or the Attorney General. Their duplicitous and unfounded claim that the Cap-and-Trade program does not, and was never designed to, cover emissions from local land use projects is untenable in light of Cap-and-Trade’s clear administrative record proving otherwise.

CARB furthers this artifice by arguing that, if local projects like Centennial and WLC are permitted to rely on Cap-and-Trade reductions, then “more and more of our state’s carbon ‘cap’ would be taken up by increasing transportation emissions.” See CARB Letter at 6. As a result, CARB argues, there “will be no clear incentive to alter this pattern” because local projects “do not receive a price signal from Cap-and-Trade.” Id. This argument, however, falls apart on review of CARB’s Statement of Reasons:

We believe that cap-and-trade’s market-based approach is the most cost-effective and practical approach to lower emissions throughout most of California’s economy. ... Placing a price signal on

transportation fuels will reduce the consumption of transportation fuel; driving investment in newer, more fuel-efficient vehicles. ... [C]ap-and-trade is not well-suited to address emissions from millions of distributed point sources such as automobiles. However, our approach is not to apply cap-and-trade to the end user (vehicle drivers), but to the fuel suppliers, who will be responsible for fuel that is combusted. By taking this “upstream” approach in the regulation, we avoid the challenges of applying [Cap-and-Trade] to millions of “downstream” users.27

As this quote demonstrates, Cap-and-Trade was specifically designed to ensure, in CARB’s words, that “carbon costs are passed through” from upstream suppliers to downstream customers so that “these users will face carbon costs on all direct and indirect emissions. ... By implementing a market-based program, certain commodities will have a carbon price to incent changes in behavior to reduce associated GHG emissions.”28 Given this administrative record, neither CARB nor the Attorney General cannot legitimately claim that Cap-and-Trade was not designed to cover emissions generated by the downstream combustion of fossil fuels supplied in California.

Given the administrative history of the Cap-and-Trade program, Commenter’s claim that Cap-and-Trade was never designed to cover GHG emissions generated by a land use project’s consumption of fossil fuels is without a merit and should be rejected by the Board of Supervisors. As explained above, the Centennial EIR’s analysis of the relationship between the project and Cap-and-Trade was not only proper, it has been sanctioned by controlling case law. As explained in Attachment H, approximately 96% of Centennial emissions are attributable to the consumption of fossil fuels sourced from upstream fuel suppliers that are subject to Cap-and-Trade. In accordance with Newhall, AIR and CEQA Guidelines § 15064.4(b)(3), it is appropriate for the Centennial EIR to adjust the project’s GHG emissions to reflect the use of compliance instruments under the Cap-and-Trade program by the project’s upstream fuel suppliers, especially in light of the Statement of Reasons’ plain language.

Response to VI. “The FEIR Does Not Adequately Analyze the Project’s Air Quality Impacts”

The Applicant disagrees with the commenter’s unsubstantiated opinion that the EIR’s analysis and mitigation of the project’s direct, indirect and cumulative air quality impacts are inadequate, incomplete, or otherwise lacking in detail or clarity. Other than make generalized assertions regarding commenter’s opinion of this analysis, commenter completely fails to identify any one purported CEQA deficiency with any specificity or particularity. In addition, commenter completely fails to explain the basis for its comments and does not provide any supporting data or references offer facts, reasonable assumptions based on facts, or expert opinion support by facts.

The Applicant disagrees with this comment’s unsupported claims regarding the adequacy of the EIR’s air quality analysis. Indeed, as explained in the FEIR, the South Coast Air Quality Management District (SCAQMD) submitted a letter to the County, dated July 13, 2017, indicating that it reviewed the Draft EIR and determined that the Project “will provide a broad range of residential (including affordable housing), commercial, institutional, recreational, and employment-generating land use types, which will make nearly half of daily vehicle trips occur within the proposed project area.” The SCAQMD letter goes on to state that the Project “exemplifies the [County’s] leadership in promoting sustainable communities” and that it “supports the goals” of SCAQMD’s 2016 Air Quality Management Plan (AQMP) and “will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the Basin” (see Comment D.4-2). In addition, the Antelope

27 FSOR at 177-178.
28 Id. at 655.
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y Air Quality Management District (AVAQMD) submitted a letter to the County, dated May 26, 2017, indicating that it reviewed and had no comments on the Draft EIR (see Comment Letter D.1). Thus, the two air districts with jurisdiction over the Project do not share Commenter’s unfounded concerns regarding the EIR and its air quality analysis.

With regard to this comment’s general concerns regarding cumulative development, please see FEIR Response to Comment F.8-194, which explains that there is substantial evidence in the administrative record that cumulative development within the South Coast, Mojave Desert, and San Joaquin Valley Air Basins, combined with the Project, conform to the growth projections, assumptions and mitigations underlying or incorporated into the Air Quality Management Plans (AQMPs) and Regional Transportation Plans and Sustainable Communities Strategies (RTP/SCS) applicable to those basins.

As discussed in more detail in responses to Comments F.8-20 and F.8-193, the SCAG 2016 RTP/SCS and the KernCOG 2014 RTP/SCS, and their accompanying EIRs, take into account cumulative regional growth projections, including the Centennial, Newhall Ranch, Tejon Mountain Village and Grapevine projects, as required by CEQA and SB 375. Both plans have been reviewed by all federal, state and regional expert agencies with jurisdiction over the air basins within the planning areas of the SCAG 2016 RTP/SCS and KernCOG 2014 RTP/SCS and both plans have been determined to be in conformity with the State Implementation Plan (which incorporates all applicable AQMPs) to achieve and maintain air quality standards. This is explained in detail in the EIR, with analysis specific to the applicable AQMPs and RTP/SCS documents. The County is entitled to rely on these determinations, as discussed in response to Comment F.8-193.

With regard to this comment’s general concerns regarding air pollution drift, please see FEIR Response to Comment F.8-185, which discusses in detail the EIR’s analysis of this purported Project impact. With regards to this comment’s characterization of the Project as “leapfrog” development, please see FEIR Response to Comment F.8-20. With regard to this comments generalized concerns regarding health impacts associated with air pollution, please see FEIR Response to Comment F.8-196, which discusses in detail the EIR’s analysis of this purported Project impact.

Response to VII. “The FEIR Does Not Analyze the Project’s Significant Impacts on Existing Urban Areas”

The Applicant disagrees with this comment’s unsupported assertion that the EIR is somehow deficient for failing the Project’s purported potential to cause urban decay. Notably, commenter provides no evidence that it is reasonably foreseeable that the Project could result in such impacts, other than the purely speculative argument that some business and residents might relocate to the Project site from other parts of the County. Commenters completely fail to provide any evidence that urban decay is a foreseeable result of such relocations. Even if commenter’s speculations are accurate and some residents and business relocate to the Project site from other parts of the County, it is just as likely that the former homes and business sites of such transplants will be purchased and rented by new owners who will ensure that such properties do not become blighted. In any case, such purported relocations are merely social or economic impacts. CEQA Guidelines § 15131 is clear that social and economic impacts of a project “shall not be treated as significant effects on the environment” in the absence of substantial evidence of that such social or economic impacts will cause significant environmental effects. Commenters provide no such evidence. In point of fact, research shows that the mere fact of development outside of the city core is not evidence that that

29 DRP 2017, p. 5.11-13 to -17, -74, -75; 7-3 to 7-9, -20

Exhibit 1 to December 10, 2018 Tejon Ranch Company Letter to the Los Angeles County Board of Supervisors
city core will become blighted, as commenter claims, particularly in economically productive regions characterized by an extreme housing shortage. Given the lack of evidence that development of the Project will foreseeably cause urban blight, commenter's claim that the EIR is required assess the Project's purported urban decay effects is without merit.

Response to VIII. “The Development Agreement Contains Provisions That Are Either Illegal or Contrary to Public Policy”

The commenter is apparently unfamiliar with the concept of development agreements and their enabling statute, Government Code § 65864 et seq. Commenter complains that development would significantly restrict the County’s application to the Project of subsequently enacted County laws, but this result is precisely what Government Code § 65866 expressly permits and what development agreements are primarily intended to achieve. As commenter correctly deduces, in accordance with Government Code § 65866, once the Project DA becomes effective, subsequently enacted County laws and regulations governing permitted uses of the land, density, design, improvement, and construction standards and specifications, will not apply to the Project, unless otherwise specified in the DA itself. This is consistent with controlling case law. As explained by the Supreme Court in West Hollywood v. Beverly Towers (1991) 52 Cal.3d 1184, 1194, “[t]he purpose of the vesting map and the development agreement is to allow a developer who needs additional discretionary approvals to complete a long-term development project as approved, regardless of any intervening changes in local regulations.” Thus, commenter’s frivolous claim that the County fails to justify this standard, vesting feature of all development agreements should be disregarded.

With respect to commenter’s generalized concern that the DA unreasonably ties the County’s hands during the term of the agreement, it should be noted that the DA includes several limitations on the general rule that subsequent County enactments will not apply to the Project during the DA term. For example, DA section 3.2 provides that the County may apply to the Project any future enactments that fall within the definition of a “Reserved Power.” The DA defines the term Reserved Power to include the power to enact and implement future rules after the DA effective date that (i) prevent or remedy conditions which the County has found based on substantial evidence to be injurious or detrimental to the public health and safety, (ii) are California Building Standards Codes, (iii) are necessary to comply with state and federal laws, rules and regulations or to comply with a court order or judgement of a state or federal court, (iv) are agreed to or consented to by the Property Owner, or (v) are County-wide fees or charges of general applicability that are included in a County fee schedule adopted by the Board of Supervisors. Thus, commenters concerns that changes to state or federal laws or regulations, including California’s green building standards, will never apply to the Project during the term of the DA are unfounded, though the commenter is correct that DA section 3.2 does

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afford the Applicant certain procedural rights with which the County must comply before implementing its Reserved Powers in accordance with the DA. Such procedural rights are entirely appropriate and serve to protect the Applicant’s significant investment and grant of public benefits to the County by requiring the DA parties to meet and confer to determine the minimally burdensome method for Project compliance with changes in applicable state or federal law.

Commenter also suggests that DA section 5.1 would somehow excuse the Project’s compliance with, or the County’s enforcement of the MMRP, following expiration of the DA term. DA section 5.1 governs the DA’s annual review process and requires the Property Owners to submit evidence during each such annual review that demonstrates the Property Owner’s compliance with the MMRP during the preceding 12 month period. While it is true that the Applicant’s contractual obligations under section 5.1 of the DA would expire when the DA term expires, the County’s separate obligation under CEQA to enforce the MMRP would nevertheless survive expiration of the DA. Thus, commenter’s claim that the DA section 5.1 somehow renders the MMRP unenforceable upon expiration of the DA is entirely without merit.

With regard to commenter’s concerns regarding applicability of the DA in the event the Project site is annexed to an existing city or incorporated into a new city, Section 4.1 of the DA is clear that, in the event of annexation, “it is the intent of the Parties that this Agreement shall survive and be binding on such other jurisdiction.” Section 4.2 of the DA further provides that, in the event of incorporation, the DA shall be governed by Government Code section 65865.3, which provides that, upon incorporation, the DA “shall remain valid for the duration of the agreement, or eight years from the effective date of the incorporation, whichever is earlier.”

Commenter suggests that DA section 7.9.1 allows the County to amend the DA in a manner that would evade the County’s CEQA compliance obligations. This claim is inaccurate. Section 7.9.1 is a relatively commonplace provision that says if there are changes or interpretations of the DA needed over the duration of its term, such items may not necessarily arise to the level of requiring a formal amendment (which is a discretionary approval subject to the provisions of Govt. Code section 65868 that is processed like the initial DA). As reflected in Sections 3.9 and 7.9.1, the use of interpretive guidance, operating memorandum or minor alterations must be “to the extent allowed by law” and, indeed, the DA sets up a protective method to determine if an operating memorandum should in fact be treated as a more formal amendment to the DA (see Section 7.9.1):

County Counsel shall be authorized, upon consultation with and approval of the Property Owners to determine whether a requested clarification may be effectuated pursuant to this Section 7.9.1 or whether the requested clarification is of such a character to constitute an amendment to this Agreement which requires compliance with the provisions of Section 7.9.

No public policy precludes this approach. Parties to an agreement are generally allowed to decide how its interpreted, subject to applicable law. DA section 7.9.1 allows the parties to discuss whether interpretations or minor revisions require a formal DA amendment, but in no way insulates the County from performing its obligations under CEQA.

Response to VIIIA. “The Development Agreement’s Affordable Housing Provision is Inadequate and Vague”

The Applicant disagrees with this comment’s characterization of the DA provisions regarding the Project’s affordable housing obligations. As explained in DA Section 11.1, 15% of the residential units constructed throughout the entire Project, which may include both homeownership and rental units,
shall be made available as affordable units to very low, low and moderate income individuals and families earning between 50% and one hundred and twenty percent and 120% of the Los Angeles County area median income, as determined by the US Department of Housing and Urban Development (adjusted for household size) ("AMI") This DA section also expresses the parties intent that affordable units will be constructed simultaneously with the overall residential development of the Project, shall be intermixed with market rate development, and will include similar size and design as market rate product.

DA section 11.2 goes into greater detail, explaining that the parties must cooperate to develop and prepare an “Affordable Housing Implementation Plan” (AHIP), with the participation by the Executive Director of the County of Los Angeles Community Development Commission and the Director of Planning, which AHIP must be prepared and executed within 1 year of the DA effective date. This DA provision further clarifies that AHIP must include, among other things:

(1) Identification of the exact mix of affordable units (i) among very low, low and moderate AMI thresholds and (ii) among rental and for-sale housing types (subject to DA section 11.4, discussed below);

(2) Provisions identifying the Property Owners as having responsibility for compliance with the affordable program unless and until there is a County-approved and recorded assignment and/or associated affordability covenants for any parcel that is sold or assigned to a third party developer;

(3) Requirements that the affordability covenants must be recorded prior to, and senior to, any covenants or deeds recorded in conjunction with future land sales and/or Assignments of parcels designated to include affordable housing set-aside units;

(4) requirements that the sale or rent of affordable units be prioritized for the lowest income qualifying buyers/renters, to the extent permitted by law; and

(5) the timing by which affordable units will be made available, which must be reasonably contemporaneous with the overall development of project housing units, but generally requires at that at least 125 affordable units be made available for every 1,250 market-rate residential units issued certificates of occupancy.

This comment’s claim that DA section 11.5 could relieve the Project of its 15% affordable housing obligation is entirely without merit. As explained in DA 11.2, the practical implementation of the AHIP envisions the sale of parcels to specific developers who agree to implement a portion of the housing set-aside requirements, however the overall responsibility for compliance shall rest with the Property Owners until there is a County-approved and recorded Assignment and/or associated Affordability Covenant for any parcel that is sold or assigned to a third party developer. DA section 11.5 merely provides that the Property Owner will receive a credit against the 15% affordable unit obligation for each unit that is made available, even if a third party developer fails to attract buyers of such units or otherwise violate their obligations under a valid Assignment and/or associated Affordability Covenant. Nothing in DA section 11.5, however, allows the Project to avoid meeting the overall 15% affordable housing obligation.

This comment’s preference that the Project be required to reserve greater than 15% of its units for affordable housing is noted. It is further noted that this comment does not raise any concerns regarding the adequacy of the EIR.
Response to IX. "The FEIR Does Not Reflect the County's Independent Judgment"

Commenters’ claim that the EIR violates CEQA because it purportedly fails to reflect the County's independent judgement is entirely meritless. Public Resources Code § 21082.1 is clear that an EIR (whether it be a draft of otherwise) may be prepared by individuals other than County employees and expressly permits any person to submit information for inclusion in an EIR. Moreover, CEQA Guidelines 15084(d) expressly states that an EIR may be prepared the applicant. The “‘preparation’ requirements of CEQA (§§ 21052.1, 21151) and the Guidelines turn not on some artificial litmus test of who wrote the words, but rather upon whether the agency sufficiently exercised independent judgment over the environmental analysis and exposition that constitute the EIR.” Friends of La Vina v. County of Los Angeles (1991) 232 Cal.App.3d 1446, 1455. In this case, the administrative record is clear that County staff, and its consultants and legal counsel, were intimately involved in the preparation of the Centennial EIR, including its responses to comments. Moreover, despite this comment’s inaccurate claims to the contrary, the Centennial EIR provides complete and thorough responses to all EIR comments submitted by interested public agencies, including the Department of Fish and Wildlife. Indeed, the Final EIR includes responses to all comments on the EIR received after close of the Draft EIR public comment period and prior to the close of the Regional Planning Commission’s hearing on the project, even though such responses are not required by CEQA. Contrary to this comment’s inaccurate claim, the Project and its mitigation measures have been extensively revised to address such comments where appropriate, as shown in detail in Section 3.0 of the Final EIR. Commenter provides no evidence that even remotely suggests that the Centennial EIR does not reflect the County's independent judgement and thus this comment should be disregarded in whole.

Response to X. “The DEIR Fails to Adequately Disclose, Analyze, or Mitigate the Project’s Impacts to Population, Housing, and Employment"

This comment is introductory to the subpart of section X of commenter's letter and does not state any specific concerns regarding the EIR analysis. The Applicant, however, disagrees with this comment’s general claim the Project would adversely affect the region's “housing, population, or employment sectors.” To the contrary, the Project implements the AVAP and would provide much needed housing in a region that is starved for new housing opportunities.

Response to X.A. “The Project Does Not Adequately Address California’s Need for Affordable Housing”

The Applicant agrees with Commenter that the region has a well document housing shortage, but disagrees with this comment’s inaccurate statement that the Project’s proposed residential units “would do little” to aid this regional crisis. Through the provision of both market rate and affordable housing, the Project will significantly aid the County in its efforts to provide much need housing in the region.

As explained in Response to Comment F.8-20, to seriously mitigate California’s housing shortage and its disproportionate impact on low income households, the California Legislative Analyst’s Office (LAO) estimates that California must construct 100,000 additional residential units on top of the
100,000 to 140,000 housing units the state is expected to build annually, and these units must be located almost exclusively in California’s costal metro areas, including Los Angeles County.\(^{31}\)

In its report, California’s High Housing Costs: Causes and Consequences, the LOA provides evidence that the development of market-rate housing plays a critical role in ensuring housing affordability for low income households. Specifically, in its report, the LOA demonstrates that urban counties across the country with more market rate housing construction had slower rent growth than California coastal areas, including Los Angeles County, by a wide margin.\(^{32}\) The same report shows that, in the Bay Area, for example, census tracts with more market-rate housing developed had substantially less low-income household displacement than those with less market-rate construction.\(^{33}\) The Project DA obligates the Project to ensure that 15% of the residential units constructed throughout the Specific Plan will be made affordable to very low, low, and moderate incomes households. This commitment will substantially aid the County in its efforts to provide affordable housing in the region. But the Project’s market-rate units also serve an important role in increasing the regional housing supply and thus put downward pressure on regional rent increases.

**Response to X.B. “The FEIR and Supporting Documents Do Not Clearly Present the Project’s Affordable Housing Component”**

As commenter correctly notes, the Project has agreed to increase from the 10% to 15% percent the number Project residential units that will be made available to very low, low, and moderate income individuals. Specifically, the Project is proposing that 15% of the residential units constructed throughout the Specific Plan be made available as affordable units to very low, low, and moderate income individuals and families earning between 50% and 120% of the County area median income. All such affordable units will be subject to deed restrictions and affordability covenants. To implement this requirement, and at the County’s request, DA section 11.2 requires the parties to cooperate in the development of an Affordable Housing Implementation Plan (AHIP) with the participation by the Executive Director of the County of Los Angeles Community Development Commission and the Director Planning. As explained in the DA, the AHIP will determine the exact mix of affordable units among very low, low and moderate AMI thresholds. Although commenter attempts to characterize the specifics of the Project’s affordable housing program as a legal infirmity, it provides no legal support for its implied claims. This is unsurprising, considering that that a Project’s social or economic impacts are beyond the scope of CEQA in the absence of substantial evidence that such social or economic impacts will cause significant environmental impacts. Commenter provides no such evidence here and its generalized comments should be thus be disregarded.

**Response to X.C. “The Project Does Not Provide Housing that is Affordable to the Very Low-Income Category”**

This comment cites Specific Plan’s target densities for the various types of residential land use designations as evidence that the Project’s affordable housing commitments cannot be achieved without the use of subsidies. The Specific Plan, however, is clear that the Project’s Affordable Housing Program is designed “to facilitate deed-restricted, subsidized, and trackable affordable housing opportunities through collaboration with affordable and mixed-income developers.” Thus the


\(^{32}\) Id. at 10.

\(^{33}\) Id. at 36.
Specific Plan reflects the economics of affordable housing construction in California, which routinely relies on tax exempt financing and other forms of public subsidies. This comment does not raise any concerns regarding the adequacy of the EIR.

Response to X.D. “It is Unclear How Increased Affordable Housing Will Affect Very Low-Income Individuals”

As noted above, at the County’s request, DA section 11.2 requires the parties to cooperate in the development of an AHIP with the participation by the Executive Director of the County of Los Angeles Community Development Commission and the Director Planning. As explained in the DA, the AHIP will determine the exact mix of affordable units among very low, low and moderate AMI thresholds, but the DA includes detailed performance standards to ensure that the required affordable housing program is implemented. For example, DA section 11.2 requires that AHIP include enforcement mechanisms to require that for every 1,250 market-rate residential units issued certificates of occupancy, the County shall not issue a final certificate of occupancy of for the 1,251st market-rate unit until after at least 125 affordable units are made available. This comment does not raise any concerns regarding the adequacy of the EIR.

Response to X.E. “The Project Does not do Enough to Meet RHNA Levels for Unincorporated Los Angeles County”

SCAG is the region’s designated Metropolitan Planning Organization (MPO) and serves as a forum for regional agencies to engage in cooperative decision making and regional planning activities. Among other important functions, SCAG is required by law to prepare a Regional Housing Needs Assessment (RHNA) in consultation with the California Department of Housing and Community Development (HCD). The RHNA quantifies the region’s existing and future housing need for all income levels and allocates a fair share of that need to each city and county in the region. The County is in turn required by law to periodically update its General Plan housing element to accommodate the County’s fair share of the regional housing need by identifying sufficient land designated for residential use, subject to HCD approval. HCD certified the County’s current housing element in April 2014.

SCAG projects that, through 2040, the regional population will grow by 20 percent, resulting in a net increase of approximately four million additional residents. The entire North Los Angeles County Subregion, which includes Antelope Valley and the Project site, will have 245,473 households by 2020 and 331,399 households by 2040, an increase of 85,926 households over 20 years. The unincorporated portion of this subregion is projected to have 69,982 households in 2020 and 116,546 households in 2040. As explained in Draft EIR Section 5.9, Population and Housing, the County’s housing element indicates that 30,145 new housing units are needed to meet future housing

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34 Government Code § 65584
35 Id., §§ 65583(a)(1)
36 Id., § 65580
38 SCAG 2016a, p. 3
39 DRP 2017, Table 5.9-9
40 Id., p. 5.9-16
demand through 2021, a portion of which will be provided by the Project. It is anticipated that SCAG will adopt the next regional RHNA allocation in Fall 2020, with updated housing elements due by Fall 2021. The Project’s proposed residential units go a long way toward meeting this need.

This comment argument that the Project would somehow exacerbate the regional affordable housing crises ignores basic supply and demand economics and is not supported by the evidence. Not only will the Project provide thousands of affordable housing units, it will significantly increase the regions market-rate housing supply, which also reduces pressures on affordable housing. As explained above, recent LOA studies provide evidence that the development of market-rate housing plays a critical role in ensuring housing affordability for low income households. Specifically, in its report, the LOA demonstrates that urban counties across the country with more market rate housing construction had slower rent growth than California coastal areas, including Los Angeles County, by a wide margin. The Project DA obligates the Project to ensure that 15% of the residential units constructed throughout the Specific Plan will be made affordable to very low, low, and moderate income households. This commitment will substantially aid the County in its efforts to provide affordable housing in the region. But the Project’s market-rate units also serve an important role in increasing the regional housing supply and thus put downward pressure on regional rent increases.

Response to XI. “The FEIR Does not Adequately Inform the Decisionmakers of the Growth-Inducing Impacts of the Project”

Contrary to Commenters’ claim, the EIR fully complies with CEQA’s requirement to analyze growth-inducing impacts. (CEQA § 21100(b)(5); Guidelines § 15358(a)(2)).

First, Commenters misleadingly claim that the EIR concludes the Project will not lead to growth-inducing impacts. However, this is incorrect. The EIR conservatively and explicitly concludes that the existence of the Project makes it reasonably foreseeable that additional development proposals, which could result in a significant impact on the environment, would be made outside the Project site, which is considered a significant, adverse, indirect growth-inducing impact. (See Draft EIR, page 6-9; Final EIR, response to Comment F.8-49.) The EIR also states that even though Project infrastructure would be sized only for Project use and would therefore not directly cause growth outside the Project, “future nearby landowners could proposed to connect to or build upon the Project’s infrastructure to serve future development in the surrounding area.” (Draft EIR, page 6-7.) As disclosed in the EIR, there are no Kaiser Permanente facilities currently proposed to be located on the Project site and the Caltran’s Northwest SR-138 Corridor Improvement Project EIR is in error to the extent it states otherwise. However, hospitals and medical centers are a permitted use within the Centennial Specific Plan’s Institutional land use designation and, if constructed, would contribute to the Project’s significant and unavoidable growth inducing impacts discussed above and disclosed in the EIR. (See Final EIR, Volume 1, Response to Comment F.2-41.)

Commenters take issue with the EIR’s discussion of constraints that limit its ability to induce growth in surrounding areas, including its infrastructure sizing for Project use only, and its zoning and land use constraints. However, the EIR’s discussion of these constraints is appropriate. First with regard to infrastructure sizing, Commenters’ opinion is noted, but as previously explained in Final EIR, Volume 2, Response to Comment F.8-52, the EIR’s conclusion that sizing infrastructure to serve only the Project would not lead to a direct, growth-inducing impact is consistent with CEQA requirements. Growth-inducing impacts typically result if a project provides new infrastructure that is oversized and can be used to serve other projects. Per CEQA Guidelines Section 15126.2(d), “a major expansion

41 Id. at 10.
of a waste water treatment plant might, for example, allow for more construction in service areas” and therefore cause a potentially significant impact by removing an impediment to growth. Courts have agreed that project construction of oversized infrastructure that can serve homes or business in addition to those planned for the project removes an impediment to growth, causing a potential growth-inducing impact. (Clover Valley Foundation v. City of Rocklin (2011) 197 Cal.App.4th 200.) However, growth-inducing impacts can be precluded where the infrastructure is sized to serve only the project, particularly if there are further physical or legal constraints on development in surrounding areas. As such, in its discussion of potential growth-inducing impact by removing obstacles to growth, the Draft EIR appropriately notes that the potential for such direct impacts are limited because Project infrastructure facilities are not sized to accommodate growth beyond that which is proposed for the Project. (Draft EIR, page 6-6.) Commenters assert that the EIR says the “project would not lead to growth in the surrounding area,” but this characterization is incorrect. While the page cited by Commenters indicates that Project infrastructure will not directly lead to growth from its proposed infrastructure, the Draft EIR specifically acknowledges that future development proposals are out of its control, and therefore concludes that future nearby landowners could propose to connect to or build upon the Project’s infrastructure. (Id, page 6-7.)

With regard to constraints imposed by regional and local planning and other documents, the EIR’s discussion of these constraints is also appropriate. These constraints include the 2008 Ranchwide Agreement, which precludes development in approximately 240,000 acres of open space set aside, the legally limited water supply in the Antelope Valley, and related provisions in the AVAP and County General Plan which require focusing new development in designated locations including the West EOA in which the Project site is located, and avoiding Significant Ecological Areas. (Draft EIR, pages 6-4, -5.) Commenters cite Stanislaus Audubon Society, Inc. v. County of Stanislaus (1995) 33 Cal.App.4th 144 (“Stanislaus”) for the proposition that discussion of such limitations is inappropriate. However, Stanislaus is inapposite. It is a Mitigated Negative Declaration (“MND”) case, where the lead agency argued an EIR was not required despite evidence in the record of potentially significant growth-inducing impacts – the MND summarily concluded no significant impacts could occur, despite staff and expert agency analysis indicating that a country club on agricultural land would induce surrounding residential growth. (Stanislaus, at 152-53.) Here, the County has not avoided conducting growth-inducing impact analysis, unlike in Stanislaus. Rather, the County has prepared and EIR which conducts site-specific growth-inducing impact analysis, which is appropriately informed by the effects of practical and regulatory constraints. The County does not assert that constraints make growth impossible. Rather, the EIR recognizes that “[n]otwithstanding these constraints on additional development in the Project vicinity, the existence of the Project makes it reasonably foreseeable that additional development proposals seeking AVAP amendments, which result in a significant impact on the environment, would be made outside the West EOA, which is considered a significant, adverse indirect growth-inducing impact.” (Draft EIR, page 6-9.) This analysis is appropriate under CEQA requirements.

Next, contrary to Commenters’ assertion, the EIR’s discussion of both direct and indirect growth-inducing impacts meets the standard expressed in Napa Citizens for Honest Gov’t v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342 (“Napa Citizens”), Per Napa Citizens at 369, “[n]othing in the Guidelines, or in the cases, requires more than an general analysis of projected growth.” The Napa Citizens court in fact affirmed an EIR’s analysis. (Id. at 369-71.) Commenters’ disagreement with the EIR’s conclusions with regard to the depth of analysis required under Napa Citizens is noted, but the Applicant reiterates that the County has adequately addressed growth-inducing impacts, and has

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explained in detail that it meets CEQA requirements under the *Napa Citizens* criteria. For further discussion of this topic, please see Final EIR, Volume 2, Responses to Comments F.8-47 and F.8-48.

Finally, Commenters continue to assert that discussion of the AVAP EIR’s analysis of growth-inducing impacts is inappropriate, stating that the EIR thus justifies not providing its own analysis. Both points are incorrect, as the County has explained in Final EIR, Responses to Comments F.8-46 and F.8-49. Commenter asserts that the “exact location” of potential indirect growth should be identified, but this calls for undue speculation, because the growth is uncertain, are not part of the Project, the potential for it to occur is limited by the growth constraints near the Project site, and as noted in the Draft EIR, any such proposals would be subject to environmental analysis under CEQA and a discretionary approval process by the lead agency. (Draft EIR, page 6-7.)

**Response to XII. “The FEIR Fails to Adequately Assess the Project’s Noise Impacts”**

As discussed in FEIR Response to Comment F.8-42, regarding noise impacts associated with construction of the NW SR-138 Project, the EIR concludes that there is a low possibility that Project construction would overlap with SR-138 activities because of the "mobile nature of construction activities (moving from area to area on a site or alignment)." Contrary to this comment, the FEIR did not claim that it is unlikely that Project construction and SR-138 road work would overlap in time. Rather, the EIR acknowledges that both projects may occur concurrently, but is unlikely that construction activities for both projects would occur *adjacent to same noise-sensitive receptors at the same time*. The Project site is 12,323 acres. The linear extent of the NW SR-138 project is 36.8 miles. Because of the size of both these projects, it is unlikely that construction activities for both of these projects would occur simultaneously near the same sensitive receptor for a sustained period of time. Due to the large size of the Project site, the Project will be constructed in phases, with specific portions of the site developed at different times. This is also expected with the NW SR-138 Project. It is unlikely that the entirety of the 36.8-mile stretch of SR-138 will be reconstructed simultaneously, due to impacts on traffic congestion and the large requirements in manpower and equipment. It is likely that construction would occur in phases, and once one phase is complete, construction noise at that particular location will end or dissipate as construction moves to a different location along the Project route.

Moreover, contrary to this comment’s inaccurate claims, the FEIR does provide evidence to support a conclusion of less than significant cumulative noise impacts. As explained in Response F.8-42, Caltrans projects are subject to Caltrans’ Standard Specifications and Standard Special Provisions for Noise Control, and Caltrans’ NW SR-138 Final EIS/EIR requires additional mitigation measures on the NW SR-138 Project, such as requiring construction equipment to use improved noise muffling, engine enclosures, and engine vibration isolators. In addition, since publication of the FEIR, Project mitigation measure MM 11-10 has been revised to prohibit the Project to locate any sensitive receptors within 250 feet of the near edge of the SR-138 traffic lanes, thus increasing the mandatory set by 100 feet. This increased setback requirement will further insure that this potential noise impact will be less than significant.

**Response to XIII. “The FEIR Fails to Adequately Analyze the Project’s Impacts on Visual Resources”**

As explained in FEIR Response to Comment F.8-57, regarding visual impacts, the proposed alignment of the PCT is not final. The final alignment of the PCT will be determined through discussion among PCT stakeholders and further design considerations will be acknowledged and contemplated. Second, the Project’s potential visual impact on the PCT and its uses were adequately analyzed in EIR Section 5.13, Visual Resources. Distant views of portions of the Project site are intermittently visible.
from segments of an approximate two-mile stretch of the trails that passes through the Three Points area. Due to distance and intervening topography, views of the Project site from the existing PCT alignment are very limited and do not substantially contribute to the visual experience of users of the existing PCT alignment.

Users of the currently conceptual future PCT realignment along 300th Street West would have some direct views of portions of the Project site, the foothills, and the Tehachapi Mountains, as depicted in EIR Exhibit 5.13-5. The EIR acknowledges that views of the local foothills and/or Tehachapi Mountains would be partly obstructed by proposed structures. Development on the eastern section of the site would present trail users with views of residential, commercial, and business park structures along 300th Street West for a distance of approximately 1½ miles. Accordingly, MM 13-4 requires that structures proposed along the PCT alignment be screened by a block wall along the rear of the structures and a wide, landscaped setback that would contain the conceptual PCT realignment. These features would reduce visual impacts on PCT users by limiting visibility of on-site urban uses in the foreground of views from the trail as it passes through the site. The location and design of the conceptual PCT realignment is intended to be similar (i.e., some rural/agricultural uses and some land development) to comparatively better than views from the existing alignment. Therefore, views from the conceptual future realignment of the portion of the PCT along 300th Street West would be reduced to a less than significant level.

In any case, “[t]he possibility of significant adverse environmental impact is not raised simply because of individualized complaints regarding the aesthetic merit of a project. Under CEQA, the question is whether a project will affect the environment of persons in general, not whether the project will affect particular persons.” *Eureka Citizens for Responsible Gov. v. City of Eureka* (2007) 147 Cal.App.4th 357, 376. Reviewing court's routinely uphold less than significant aesthetic impact determinations when mitigation requires the project site to be screened by intervening structures, topography, landscaping or other measures, as in the case here. See, e.g., *North Coast Rivers Alliance v. Marin Municipal Water Dist.* (2013) 216 Cal.App.4th 614. Here, the EIR determined that the Project’s aesthetic impacts on PCT trail users would be less than significant with mitigation and thus adequately addressed this issue.

**Response to “Conclusion”**

Commenter’s closing statement of general opposition to the Project is noted and does not warrant a response.
Exhibit 2 - Responses to December 6, 2018 California Native Plant Society Letter to the Los Angeles County Board of Supervisors, Re: “Clarification of the Fire Risk on the Centennial Specific Plan Project Site”

The following responds to a letter signed by Nicholas Jensen of the California Native Plant Society (“Commenter”), addressing the Centennial Specific Plan Project (“Project”) and sent to the Los Angeles County Board of Supervisors (“Board”) on December 6, 2018. The following responses are organized as presented in Commenter’s letter.

Response to Introductory Remarks

Commenter again asserts that the Project would remove “irreplaceable grasslands habitat.” However, this is incorrect, and the County has addressed this issue in the EIR. First, in recognition of the biological importance of Tejon Ranch, the Tejon Ranch Company (“Applicant”), voluntarily agreed to permanently preserve 90 percent of the Ranch determined to be the most ecologically important, and limit development to the less than 10 percent of the Ranch determined to be developable without compromising biological integrity and biological values. The Project will fully mitigate its impacts to grasslands with a mitigation ratio of 2:1 (please refer to Draft EIR, Section 5.7.6, Environmental Impacts, and MMRP). The Project region is an important ecological region, but preservation of thousands of acres of important biological resources is an objective of the Project, and the proposed 43,080-acre mitigation preserve system contains all major habitat types, including grasslands. (Draft EIR, page 4-4; Response to Testimony RPC-219) The biological value of the proposed preserve system is further enhanced by its continuity with other open space areas. While it is acknowledged that the Project site occurs within this important ecozone, vast swaths of biologically rich land are preserved through the Project’s mitigation process. For example, Project site grasslands are not unique to the Project site, and 14,908 acres of grasslands will be preserved on the Mitigation Preserve, which grasslands abut and present a continuation of the Project site grasslands. Intensive, multi-year grassland studies have revealed that grasslands of equal or greater value occur in vast quantities in the Mitigation Preserve. For further discussion of grasslands, please see Final EIR Responses to Comments B.4-17, B.4-43, B.4-63, F.7-22, F.8-124 to -128, and F.8-131.

Commenter also asserts that analysis of how Project-related emissions are covered by California’s Cap-and-Trade Program is inappropriate. The Applicant addressed Commenter’s assertion in detail in Exhibit 1 to the Tejon Ranch Company Letter to the Los Angeles County Board of Supervisors dated December 7, 2018, Re: “Centennial Specific Plan Project No. 02-232 – Applicant Responses to Project-Related Correspondence Received October 31, 2018 to November 27, 2018, and Comprehensive Wildfire-Related Response.” Exhibit 1 to that letter is entitled “Responses to Letter from Nicholas Jensen PhD, of the California Native Plant Society, and Multiple Other Signatories, Re: ‘Centennial Specific Plan Final Environmental Impact Report and Attachment H-Updated Greenhouse Gas Calculations,’ dated November 16, 2018.” Please see that exhibit for the Applicant’s responses to this assertion.

Commenter expresses concern about the Project site’s proximity to known faults. With regard to the Project site’s location in relation to the Garlock and San Andreas faults, the presence of on-site, nearby, and regional faults is clearly disclosed in Draft EIR Section 5.1, Geotechnical. The only fault in the vicinity of the Project site within a designated Alquist-Priolo Earthquake Fault Zone is the San Andreas Fault. (Draft EIR, page 5.1-9) Consistent with State regulations, there would no building on or within the required setback of the Alquist-Priolo Earthquake Fault Zone for the San Andreas Fault. (Draft EIR, pages 5.1-16, -17) The setback zone for the San Andreas Fault is incorporated into the Geologic Safety Zone, which also establishes building setbacks for the two unnamed on-site faults.
Building setbacks are related to the risk of adverse effects of surface rupture on a fault during an earthquake. The Project would not expose people or structures to potential adverse effects from surface rupture of a known fault with implementation of PDF 1-1 (i.e., the Geologic Safety Zone). However, the risks from surface rupture of a fault are a different issue than the risks from strong seismic ground shaking during an earthquake. As stated on page 5.1-15 of the Draft EIR, “...the overall seismic risk at the Project site is the same as Southern California in its entirety.” In other words, because of the extremely high seismicity throughout Southern California, the nearness of one or more active faults does not have a direct correlation to risk of a seismic event and the magnitude of the event in a certain area. The earthquake-related hazards associated with the Project site are clearly acknowledged in the EIR, including on Exhibit 3-4, Local Area Constraints, in Section 3.0, Environmental Setting; and Exhibit 5.1-1, Regional Faults, and Exhibit 5.1-2, Geologic Hazards, in Section 5.1, Geotechnical; and on pages 5.1-9 through 5.1-13 and pages 5.1-16 through 5.1-19 in Section 5.1. The EIR concludes that there are no soil or geologic conditions present on or near the Project site that would preclude the safe development of all proposed land uses on the Project site, given incorporation of all existing and future, tract map-level, geotechnical recommendations into grading and construction plans and specifications; this includes compliance with County subdivision specifications, County zoning and building code requirements, and the Project’s Grading Plan, and the Specific Plan’s Hillside Design Guidelines. (Draft EIR, page 5.1-15) The Project shall incorporate all applicable geotechnical recommendations identified in the geotechnical documents previously prepared for the Project, including those reviewed and compiled in a 2015 Geocon report (Draft EIR, Appendix 5.1-A), and those to be identified in the geotechnical reports for the Final Engineering and Grading Plans (which must incorporate the findings of all soils engineering and geologic studies) for individual tract maps and the associated final grading plans to be processed as the Project is implemented. (Draft EIR, page 5.1-16) Implementation of these requirements would ensure that impacts related to the proximity to active faults, including proximity to the San Andreas Earthquake Fault Zone, would be less than significant.

Commenter’s concerns about the Project’s fire hazard severity zone designations are addressed further in the below, more specific responses.

Response to “1. Inaccuracies in the EIR”

Commenter asserts without support that the EIR inaccurately characterizes CAL FIRE’s methodology for choosing fire hazard severity designations. However, Commenter is incorrect. The EIR explains that CAL FIRE’s criteria include “fuels, topography, dwelling density, weather, infrastructure, building materials, brush clearance, and fire history.” (Draft EIR, page 5.3-33) The EIR indicates that factors contributing to the Project site’s designations are its limited access, lack of existing adequate fire flows, topography, and types of vegetative cover – as discussed in the EIR, these factors would be addressed by the Project. (Draft EIR, pages 5.3-35, -36) Commenter asserts, without support, that this in incorrect, and specifically that the lack of access and lack of adequate fire flows are not factors in the Project site’s designation. For this proposition, Comment relies on a CAL FIRE document listing six of the factors used in designations: vegetation, topography, weather, crown fire potential, ember production and movement, and the likelihood of an area burning over a 30-50 year time period. However, CAL FIRE has explained that there are “many factors” that could contribute to a site’s designations, and the overall consideration is what characteristics affect the probability that the area will burn and the potential fire behavior that is expected in the event of an area burning.1

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Moreover, the EIR does not rely for its impact conclusion solely on the Project addressing site characteristics that contribute to its designation. Rather, the EIR thoroughly evaluates the Project’s potential fire impacts under two thresholds of significance. First, the Draft EIR considers whether the Project would expose people or structures to a significant risk of loss, injury or death involving fires because it is located (i) within a Very High Fire Hazard Severity Zone (VHFHSZ), (ii) within a high fire hazard area with inadequate access, (iii) within an area with inadequate water and pressure to meet fire flow standards, or (iv) within proximity to land uses that have the potential for dangerous fire hazard. Second, the Draft EIR considers whether the Project constitutes a potentially dangerous fire hazard. The Draft EIR determined that, with implementation of MM 3-9, Project impacts related to fire hazards would be less than significant under the applicable thresholds of significance. This determination, however, is not reliant solely upon implementation of MM 3-9 or other mitigation measures identified in the Draft EIR. Rather, the Draft EIR concluded that Project impacts related to fire safety would be less than significant only after taking into consideration (i) Project site access, (ii) Project site water flows, (iii) Project site topography, (iv) Project site vegetative cover, (v) existing and proposed regulatory controls, (vi) existing mutual aid agreements between federal, state, and local fire safety service providers, and (vii) Project improvements and mitigation measures related to landscaping and vegetation management, building construction, circulation, public utilities, and fire protection services, including but not limited to MM 3-9.

Further, fire hazard severity designations are not intended to prohibit all development. Rather, to help limit wildfire damage to structures through planning, prevention, and mitigation activities/requirements that reduce risk. If development was prevented in high or very high fire hazard severity zones, the vast majority of Los Angeles County would be subject to development prohibitions, because the vast majority of Los Angeles County has been designated a VHFHSZ, with very small portions each designated HPHSZ or MFHSZ. (Los Angeles County General Plan, Figure 12.5) Rather, the zones are used to designate areas where California’s wildland urban interface building codes apply to new buildings, they can be a factor in real estate disclosure, and local governments consider fire hazard severity in the safety elements of their general plans.

The EIR does not conclude that the Project site’s designations will be downgraded. However, the EIR does correctly note that the County Fire Chief periodically reviews Fire Hazard Severity Zone areas and makes recommendations to the Board of Supervisors to revise the limits of these areas based on changes in any of the evaluation criteria. (Draft EIR, page 5.3-33)

Response to “2. Prevarication in Public Testimony”

Commenter next asserts that Jennifer Hernandez improperly stated that building roads and fire stations will lessen the risk at the Project site. This is not the case. As noted in more detail above in the Response to “1. Inaccuracies in the EIR,” this and many other factors are considered in fire hazard severity designations. The Los Angeles County Planning Commission recommended approval of the Project and certification of the EIR based on the entire record before it. The Commenter misstates the importance of one comment by Ms. Hernandez. The EIR does not conclude that the Project site’s designations will be downgraded. However, the EIR does correctly note that the County Fire Chief periodically reviews Fire Hazard Severity Zone areas and makes recommendations to the Board of Supervisors.
Supervisors to revise the limits of these areas based on changes in any of the evaluation criteria. (Draft EIR, page 5.3-33)

Response to “3. Misdirection in the Media”

As noted above, site access and service is a factor in the Project site's designation and current fire risk, and providing new fire stations will help to address fire risk. This is merely one aspect of the situation, and the EIR thoroughly and appropriately addresses fire risk. Commenter misrepresents the importance and impact of one comment made by Mr. Zoeller on public radio. This comment is unrelated to the adequacy of the EIR, and no further response is needed.

Response to “Conclusion”

Commenter reiterates its assertion that the Project should be rejected because of its fire hazard severity zone designations, and urges the Board to consider the facts. As discussed above, the EIR factually, thoroughly, and appropriately discusses the site’s fire risk and Project impacts, and identifies mitigation to reduce impacts to a less than significant level.
Exhibit 3 - Responses to August 30, 2018 Reader Reactions at LA Times Online: “The Suburban Centennial Development is a Fire Tragedy Waiting to Happen”

The following responds to the August 30, 2018, the LA Times published notes to the editor addressing the Centennial Project (“Project”), in the online “Readers React” section, under the heading “The Suburban Centennial Development is a Fire Tragedy Waiting to Happen”.1

Rosalie Preston, Gardena:

Rosalie Preston asserts that the Project should be rejected because of its fire hazard severity designations. The Project’s designations by the California Department of Forestry and Fire Protection (CAL FIRE), along with Project components and design features which address such designations are fully addressed in the EIR and Exhibit 5 to the Tejon Ranch Company's December 7, 2018 Letter to the Board of Supervisors Re: "Centennial Specific Plan Project No. 02-232 - Applicant Responses to Project-Related Correspondence Received October 31, 2018 to November 27, 2018, and Comprehensive Wildfire-Related Response." As discussed therein, the Project and Project site are distinguishable from the recent wildfires in California, and the Project will ensure less than significant impacts with regard to fire safety and fire services because of Project site access and design, fire services and facilities, construction materials, fuels management and planting requirements, and utility undergrounding; in addition to likely continually evolving requirements throughout the 20-year buildout period, to be implemented in subsequent approvals wherein the environmental impacts of Project implementation will be studied and further mitigated as necessary to avoid new or more severe impacts.

Ms. Preston also asserts that building the Project in its location “makes no sense as a solution to our housing crisis.” This opinion is noted, but the Applicant and the County disagree, as the County has addressed in the Project EIR. As explained in Final EIR, Volume 2, Response to Comment F.8-20, California’s housing shortage has reached crisis levels,2 and its impacts have been hardest on the region’s most vulnerable populations. To seriously mitigate California’s housing shortage and its disproportionate impact on low income households, California must construct 100,000 additional residential units on top of the 100,000 to 140,000 housing units the state is expected to build annually, and these units must be located almost exclusively in California’s costal metro areas, including Los Angeles County.3 Accordingly, the Project site is planned for intensive development under the County’s Antelope Valley Area Plan (AVAP). It has been sited and designed to promote regional “smart growth” planning principles established by the Southern California Association of Governments’ (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the AVAP, for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and

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3 Id., pp. 34, 35
promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas, consistent with the AVAP’s Rural Preservation Strategy.

Mike Post, Winnetka:

Mike Post supports the Project and asserts that Tejon Ranch Company has become the “poster child for responsible private land stewardship and habitat conservation,” noting that environmental organizations signed an agreement allowing the Project to go forward without opposition. Mr. Post is referring to the 2008 Tejon Ranch Land Use and Conservation Agreement (Ranchwide Agreement). As noted in the EIR, on June 17, 2008, Tejon Ranch Company (TRC) entered into the historic Ranchwide Agreement with Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Organizations) and the nonprofit Tejon Ranch Conservancy, which allows TRC and its development partners to pursue approvals for development of agreed-upon portions of the Tejon Ranch, including the Project site, without opposition from the Resource Organizations, while providing for the designation of Project open spaces and the dedication or sale of conservation easements over approximately 240,000 acres, or approximately 90 percent, of the 270,000-acre ranch. The agreement was reached after years of cooperative study and identification of the most appropriate respective locations for preservation and development. Per the recitals in the Ranchwide Agreement, “[t]he long-term conservation of Tejon Ranch has been one of the highest priorities” of the signatory organizations, and the agreement "follows many years of scientific analysis of conservation values on Tejon Ranch by TRC and others, including the Resource Organizations. Mr. Post’s comment does not specifically address the EIR, and therefore no further response is needed.

Roger Newell, San Diego:

Roger Newell asserts that development like the Project leads to “major climate change,” implying that the County has not used sound public policy in planning for growth on the Project site. Both the Applicant and the County disagree with Mr. Newell, as the County has explained in the Project EIR.

The Project has been sited and designed to promote regional “smart growth” planning principles established by the Southern California Association of Governments’ (SCAG) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy and the County’s Antelope Valley Area Plan (AVAP) for the purpose of accommodating regional growth projections in a sustainable manner that reduces criteria air pollutant and greenhouse gas emissions and promotes public health while protecting regional open space, Sensitive Ecological Areas and agricultural areas consistent with the AVAP’s Rural Preservation Strategy. Indeed, the South Coast Air Quality Management District (SCAQMD) has determined that the Project’s Centennial Specific Plan “exemplifies [the County’s] leadership in promoting sustainable communities development” and “will help reduce emissions from mobile sources, protect the public health from air pollution, and achieve healthful air in the [South Coast Air] Basin.” Final EIR, Comment D.4-2. See Final EIR, Responses to Comments F.8-20 and F.8-204 for further discussion.
Richard Rigney, Long Beach:

Richard Rigney supports the Project and its development pattern. This comment does not address the EIR, and no further response is needed.
Exhibit 4 - Responses to December 6, 2018 Reader Reaction at LA Times Online: “Centennial will Burn...”

The following responds to the December 6, 2018, the LA Times published notes to the editor addressing the Centennial Project (“Project”), in the online “Readers React” section, under the heading “Centennial will burn. Allowing it to be built would be environmental malpractice”.¹

Hester Bell, Altadena:

Hester Bell draws a comparison to the recent tragic wildfires in Paradise, California and asserts that the Project should be rejected because of the Project site's and the surrounding area's history of wildfires. The Project’s risks related to wildfires, along with Project components and design features which address such risks are comprehensively addressed in the EIR and Exhibit 5 to the Tejon Ranch Company's December 7, 2018 Letter to the Board of Supervisors Re: "Centennial Specific Plan Project No. 02-232 - Applicant Responses to Project-Related Correspondence Received October 31, 2018 to November 27, 2018, and Comprehensive Wildfire-Related Response." As discussed therein, the Project and Project site are distinguishable from the recent wildfires in California, and the Project will ensure less than significant impacts with regard to fire safety and fire services because of Project site access and design, fire services and facilities, construction materials, fuels management and planting requirements, and utility undergrounding; in addition to likely continually evolving requirements throughout the 20-year buildout period, to be implemented in subsequent approvals wherein the environmental impacts of Project implementation will be studied and further mitigated as necessary to avoid new or more severe impacts.

Tiffany Yap, Oakland (Scientist at the Center for Biological Diversity):

Tiffany Yap comments generally that “fireproofing” structures and the construction of new fire stations will not prevent fires started by human activity, and cites to recent studies that opine about fire risks. The Project's fire-related risks, along with Project components and design features that address such risks (which cover much more than fireproofing structures and the construction of new fire stations), are fully addressed in the EIR and Exhibit 5 to the Tejon Ranch Company's December 7, 2018 Letter to the Board of Supervisors Re: "Centennial Specific Plan Project No. 02-232 - Applicant Responses to Project-Related Correspondence Received October 31, 2018 to November 27, 2018, and Comprehensive Wildfire-Related Response." As discussed therein, the Project and Project site are distinguishable from the recent wildfires in California, and the Project will ensure less than significant impacts with regard to fire safety and fire services because of Project site access and design, fire services and facilities, construction materials, fuels management and planting requirements, and utility undergrounding; in addition to likely continually evolving requirements throughout the 20-year buildout period, to be implemented in subsequent approvals wherein the environmental impacts of Project implementation will be studied and further mitigated as necessary to avoid new or more severe impacts.

Scott Hobson, Brea:

Scott Hobson comments about the status of the California housing crisis and the “overabundance of people,” and expresses his opposition to the Project. While this comment does not appear to be made in the context of the Project's environmental review, we will still note that the Draft EIR adequately

addressed cumulative population, housing, and employment impacts. It discloses that while the Project would result in substantial growth, it would be consistent with local and regional growth assumptions.\(^2\) As such, with regard to its consistency with County and regional plans, cumulative population, housing, and employment impacts would be less than significant.\(^3\) This is consistent with Draft EIR analysis and conclusion under Threshold 9-4 in Section 4.9, *Population, Housing, and Employment*, at Draft EIR pages 5.9-23 through 5.9-31. However, with regard to Project-related growth on site relative to existing Project site conditions, the cumulative impact discussion concludes that impacts would be significant and unavoidable.\(^4\) This is consistent with Draft EIR analysis and conclusion under Threshold 9-1 in Draft EIR Section 4.9, at pages 5.9-23 through 5.9-31. While the Draft EIR discusses Project impacts and appropriate mitigation strategies for Thresholds 9-1 and 9-4 together because they are related, the Draft EIR clearly concludes that impacts are less than significant with regard to consistency with regional plans, but significant and unavoidable with regard to overall growth on the site in comparison to existing conditions. The Draft EIR also explains that there is no appropriate and feasible mitigation to reduce the significant impact under Threshold 9-1.\(^5\) In light of Project Objectives discussed in Draft EIR Section 4.0, *Project Description*, which include meeting regional planning goals and helping accommodate anticipated regional growth in an appropriate location, there is no feasible mitigation for the significant impact under Threshold 9-1. Any potential mitigation such as a significant reduction in the Project’s proposed unit count and commercial square footage would result in a development proposal that is not consistent with the goals and policies of the AVAP related to the development within the West EOA or with SCAG’s regional growth projections, and therefore would not support Project Objectives. Please see Final EIR, Response to Comment F.8-44, for further discussion.

\[^2\] DRP 2017, pp. 7-18 and 19
\[^3\] *Id.*, p. 7-19
\[^5\] *Id.*, pp. 7-19, 5.9-31
Exhibit 5 - Responses to December 7, 2018 SCV News Article: “Dec 11: Supes May OK Centennial at Tejon Ranch Development”

The following responds to the December 7, 2018, SCV News published news article written by Stephen K. Peeples addressing the Centennial Project ("Project"), under the heading “Dec 11: Supes May OK Centennial at Tejon Ranch Development”.1

Stephen K. Peeples describes the Project and provides information about the December 11, 2018 Board of Supervisors hearing on the Project. This comment does not address the adequacy of the EIR, and no further response is needed.

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Exhibit 6 - Responses to December 8, 2018 LA Times Editorial: “Just Say No to More Southern California Sprawl”

The following responds to the December 8, 2018, the LA Times article by the Times Editorial Board addressing the Centennial Project (“Project”), under the heading “Just say no to more Southern California sprawl”.¹

The commenter first describes the Board of Supervisors as having a choice between sprawl or sustainable growth. See Final EIR, response to Comment F.8-20, which thoroughly addresses the assertion that the Project constitutes or would contribute to sprawl. For further discussion of growth-inducing impacts, see Draft EIR, Section 6.0, Growth-Inducing Impacts, and Final EIR, responses to Comments F.8-47 through F.8-49.

After noting the State’s housing crisis, the commenter goes on to state that the Project site is designated by the California Department of Forestry and Fire Protection (CAL FIRE) as high and very high fire hazard severity areas. The Project site’s CAL FIRE designations along with Project components and design features which address such designations are fully addressed in Exhibit 5 to the Tejon Ranch Company’s December 7, 2018 Letter to the Board of Supervisors Re: "Centennial Specific Plan Project No. 02-232 - Applicant Responses to Project-Related Correspondence Received October 31, 2018 to November 27, 2018, and Comprehensive Wildfire-Related Response." As discussed therein, the Project and Project site are distinguishable from the recent wildfires in California, and the Project will ensure less than significant impacts with regard to fire safety and fire services because of Project site access and design, fire services and facilities, construction materials, fuels management and planting requirements, and utility undergrounding; in addition to likely continually evolving requirements throughout the 20-year buildout period, to be implemented in subsequent approvals wherein the environmental impacts of Project implementation will be studied and further mitigated as necessary to avoid new or more severe impacts.

The commenter next asserts that, “brand-new homes in Ventura built to the state’s most current standards were destroyed by the Thomas fire.” However, the article linked as the source for this information goes on to reference standards adopted 10 years ago. The Los Angeles County Fire Code (Municipal Code Title 32) incorporates by reference the California Fire Code, which is updated on a regular basis, most recently in 2016. The Project will be built to the most current Fire Code standards applicable. During the approximately 20 years of Project buildout, applicable Fire Codes, standards, and guidelines will likely be continually updated by State and County agencies as the knowledge gained from past fires is increased; these updated code requirements, as finalized through discussions with the Los Angeles County Fire Department, would be applied to subsequent development phases of the Project to ensure that Project development continues to meet evolving standards to ensure impacts are less than significant. (Draft EIR, page 5.3-37) Further, unlike Ventura, the Project is a master planned community and can therefore realize benefits of comprehensive emergency planning and access design.

The commenter then asserts that climate change fuels more frequent, more destructive fires. Impacts of increase wildfire risks associated with climate change on the Project itself is an example of a potential future environmental impact on the Project, rather than the Project’s impact on the environment. The latter requires analysis per CEQA, but the former does not. As the California Supreme Court recently confirmed, CEQA does not generally require an analysis of entirely external influences on a project. (California Bldg. Indus. Ass’n. v. Bay Area Air Quality Mgmt. Dist. (“CBIA”) (2015) 62 Cal. 4th 369, 386.) Although climate change is impacting the environment in a variety of ways, these impacts are occurring independent of the proposed Project, and will happen regardless of whether the Project is implemented. As discussed below, with certain exceptions, the interaction between climate change impacts and Project impacts cannot be predicted with any degree of certainty. As CBIA affirmed, the EIR for the proposed project need not analyze impacts that would occur independent of the project.

Although there is general consensus among scientists that climate change is occurring and will have actual effects on biodiversity, ecosystem function, species, and habitats, there is currently a high degree of uncertainty at a community, ecosystem, or regional level. Notwithstanding the global (rather than site-specific or even state-specific) nature of climate change issues, the EIR does expressly disclose the risks associated with climate change, in EIR Section 5.21. However, the precise parameters of how these risks will interact with development resulting from this or any single development project at any particular location including the Project site cannot be predicted with certainty based on existing science. Where climate change risks may affect the development brought to the project, these topics are addressed in the EIR. In contrast, with respect to impact areas where specific risks are not associated with the project area, a detailed analysis is not required. Climate change is analyzed in the EIR when the interaction between the given risk and climate change is sufficiently well-understood to permit analysis. Estimates of climate change impacts on the future incidence and intensity of wildfires are subject to ongoing refinement and significant uncertainty. The precise relationship between climate change and wildfire risk is not understood to a degree that enables a project-specific CEQA analysis of the interaction of climate change and wildfire risks created by the project in this specific location. Rather, the mitigation measures required for the project are sufficiently protective and flexible to protect against increased risks of even severe wildfires (regardless of the cause of such wildfires), including the risks that occur in wildland-urban interface areas, that may result from climate change. Notwithstanding the variable effects climate change is expected to have with respect to wildfires, in compliance with CEQA including Section 15126.2(a) of the CEQA Guidelines, the EIR recognizes the risks associated with exposing people and structures to wildfire and includes a thorough analysis of these potential impacts as well as a detailed mitigation plan to address these risks.

The commenter makes further comments related to sprawl and climate change. The comments regarding sprawl are addressed above. Potential impacts regarding climate change is discussed in Draft EIR Section 5.21, Climate Change; Section 1.6.21, Climate Change; Section 7.3.21, Climate Change; and in other topical sections of the Draft EIR; and in various responses to Comments in the Final EIR. As discussed in response to Comment F.8-204, which includes tables showing the Project’s incorporation of numerous measures
targeting the reduction of greenhouse gas (GHG) emissions, the Project takes a very aggressive approach to reducing GHG emissions arising from the Project.

Finally, the commenter references the Southern California Association of Governments (SCAG) Sustainable Communities Strategy (SCS). SCAG’s approved SCS designates the Project site for future urbanized development, and the Draft EIR describes the Project’s consistency with the RTP/SCS in Section 5.8, Land Use,2 Section 5.9, Population, Housing and Employment,3 Section 5.11, Air Resources,4 and Section 5.21, Climate Change.5 As discussed in the Draft EIR, no conflict with SCAG’s regional growth projections would occur since SCAG’s growth projections anticipate increases in population, households, and employment in the North Los Angeles Subregion and future household and employment projections for the area that includes the Project site are consistent with the housing and employment estimates for the Project.6 See also Final EIR, Response to Comment F.8-20 for a more detailed discussion of the Project’s consistency with the SCAG 2012 and 2016 RTP/SCS balanced land use plan.

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2 DRP 2017, p. 5.8-73
3 Id., pp. 5.9-23 through 32
4 Id., pp. 5.11-74 through 75
5 Id., p. 5.21-85 through 86
6 Id., p. 5.8-73