December 7, 2018

RE: Centennial Specific Plan

Dear Los Angeles County Board of Supervisors:

We very much appreciate the opportunity to present the Centennial project for your consideration on December 11, 2018.

As a preliminary matter, we want to thank the County staff and stakeholders who have worked with us on this project for many years. We are grateful to your staff, and their hard work and dedication in helping us improve the project. We want to thank members of the public specifically the residents of the Antelope Valley, and representatives from other agencies, who have participated in our robust environmental review and hearing process, and likewise helped improve the project. We also want to thank members of the Planning Commission, who helped us refine the affordable housing, local workforce program and electric transit for the project – and who recommended certification of our environmental impact report (EIR) and approval of the project on a 4-1 vote after three public hearings and a site visit.

We take this opportunity to briefly address some key points about the project in anticipation of our upcoming hearing.

1. Centennial Implements Approved Local and Regional Land Use and Zoning Plans for this Site

The Centennial project is consistent with, and implements, the Antelope Valley Area Plan and the General Plan, both of which were approved in 2015 by this Board of Supervisors. The Antelope Valley Area Plan EIR was upheld by the appellate court earlier this year, and the General Plan and its EIR were not challenged. Both of these approved County plans include the development of a substantial new community at this location. The EIR confirms that the project is consistent with all of the goals and policies of the General Plan and Antelope Valley Area Plan.

The Centennial project is also consistent with the region’s Sustainable Communities Strategy (SCS) for achieving greenhouse gas reductions; the SCS elements for Los Angeles County including the project site were endorsed by this Board, and the entire regional SCS was
approved by the Southern California Association of Governments and the California Air Resources Board.

The Centennial project is also consistent with the comprehensive environmental preservation and land use agreement between Tejon Ranch and five of the state’s leading environmental advocacy groups, including the Sierra Club, the Natural Resources Defense Council, Audubon California, the Planning and Conservation League, and Endangered Habitats League. This landmark agreement conserves more than 90% of the 270,000-acre Tejon Ranch, and limits future development to 10% of the Ranch in three locations – including Centennial – selected based on the independent scientific investigations conducted by the environmental groups, and determined to be consistent with meeting both regional conservation and environmental priorities.

In short, approval of the Centennial project is the implementation of local, regional, and environmental plans that have already been approved.

2. Centennial’s Specific Plan Implements County Goals and Policies

The Antelope Valley Area Plan required that a Specific Plan be prepared for the new community proposed on the project site, which is within the West Economic Opportunity Area designated in that plan. A Specific Plan requires completion of a comprehensive land use plan that addresses residential, commercial, institutional and recreational land uses, along with corresponding plans for transportation and other public infrastructure as well as public services and utilities. The Centennial Specific Plan includes all of these components, as well as additional components such as the project’s affordable housing program and its Green Development Program.

The Centennial community has been designed to achieve all of the County’s goals and policies for new urban development at this location, as confirmed by the EIR. The sustainable community design includes pedestrian and bicycle pathways, walkable and neighborhood-scaled parks and schools, new sheriff and fire stations that will serve both the new community and improve response times and staffing levels for existing Antelope Valley residents, and a significant new employment center to balance new jobs with new housing. The Development Agreement negotiated by staff also requires us to build a new County Civic Administration Facility. The project provides for its own water supply and includes both a new onsite water bank and an adjacent existing Tejon water bank for use in the event of future droughts. The project also includes tertiary treatment of wastewater and maximizes the reuse of reclaimed water for authorized uses such as outdoor irrigation and commercial plumbing. The project includes numerous sustainability features to conserve water and energy, including storm water capture, as well as solid waste reuse and recycling programs including onsite composting and a materials recovery facility. These and many other design details have been carefully shaped over many years and helps Centennial achieve California’s per capita greenhouse gas goal for 2050.
3. **Protection of Biological Resources and Permanent Prohibitions on Development**

Centennial is the third and final new community identified in the landmark Tejon Ranch Conservation and Land Use Agreement. This 2008 agreement remains the largest land conservation commitment ever made by a private landowner in California history, and reflects the outcome of years of independent scientific evaluation by biological resources experts. The other two new communities, which along with Centennial collectively comprise less than 10% of the Tejon Ranch lands, have already been approved by Kern County. Bringing an important 35,000 housing units and 35 million square feet of commercial/business park to Southern California while conserving over 240,000 acres of conservation land for future residents and visitors to enjoy. The Ranchwide Agreement also included important biological resource protection design details for the Centennial project, including for example areas within the Centennial site boundary required to be preserved such as natural drainages.

The biological resources of the Centennial site, and the cumulative impacts and regional context for the development and conservation included in the Ranchwide Agreement, have also been considered by numerous other stakeholders through the EIR process completed for each project, and through the permitting decisions of expert agencies. For example, in approving a Habitat Conservation Plan and associated Environmental Impact Statement (EIS) for the Tehachapi Uplands Multiple Species Habitat Conservation Plan, the US Fish and Wildlife Services expressly considered the planned future development of the remaining 10% of Tejon Ranch lands including the Centennial site. Similarly, the California Department of Fish and Wildlife has commented on all Tejon EIR and EIS documents, and has issued permits for the Tejon Mountain Village resort community, which acknowledge and address the cumulative biological and other resource impacts of implementing the 90% conservation program set forth in the Ranchwide Agreement and limiting development to three designated locations including Centennial, that through scientific analysis were the less desirable habitat preservation areas of the 270,000 acres of Tejon Ranch.

The Centennial project was modified to fully respect the independent biological resources determinations made by the County and included in the Antelope Valley Area Plan and General Plan. For example, the development footprint of the Centennial project was shrunk, to assure that the new community did not encroach into any of the newly-designated and expanded Sensitive Environmental Areas (SEAs) designated in those approved plans.

One environmental organization elected to drop out of the Ranchwide Agreement scientific study and negotiation process, and has instead filed multiple CEQA lawsuits against Tejon Ranch as well as Los Angeles County. This organization has also consistently made clear that only by converting Tejon Ranch into a national or state park, with zero future development, is an acceptable outcome. We recognize the right of this and other organizations to disagree with the independent scientific judgment of the Ranchwide Agreement signatories that restricted development to 10% of the Ranch, in locations such as Centennial that were specifically designated for future development. This disagreement between environmental advocacy organizations has been fully disclosed, and this EIR includes more than ten years of detailed biological resource studies that have been completed on the Centennial site.
4. Centennial Project is Fiscally Positive for the County

The Centennial project creates no fiscal burdens for existing county taxpayers. The developer, along with future project residents and employers, will pay for the construction and maintenance of all new infrastructure, police and fire stations, parks, library and consolidated maintenance facility and – through the Development Agreement – several other significant new public facilities including a regional animal care facility, a County Civic Administration Facility and a material recovery facility. Revenues from future residents such as assessments and taxes will pay for ongoing operation and maintenance of these facilities. The project will provide for future school funding as agreed to in the school agreements included in the EIR, and will fund all onsite and its fair share of offsite improvements to Caltrans facilities.

5. Centennial Brings Sustainable New Homes, Jobs and Services to Antelope Valley

With a statewide housing shortfall now estimated at 3.5 million homes, and a sharp decline in home ownership opportunities for working families, Centennial’s 19,333 new homes presents the County with a unique opportunity to create a diverse and sustainable new community that helps address this critical housing shortage and provide significant new homeownership opportunities for County families. We have also committed to setting aside fifteen percent (15%) of the project’s new housing as affordable housing, assuring that Centennial will create nearly 3000 new affordable housing units, which is by far the most new affordable units ever included in a County development project.

Centennial will also bring quality jobs to the County. With just over 10,100,000 square feet of new commercial space and business park, we expect a full range of new employers ranging from larger corporations to small community-serving businesses. The project will also create hundreds of community-based jobs for teachers, first responders, park and library personnel, and others. The Los Angeles Economic Development Corporation (LAEDC) projects that Centennial will provide over 22,000 permanent jobs in Los Angeles County and an equal number of construction related jobs. The permanent jobs will generate an annual labor income of almost $1.4 billion. Tejon Ranch has a proven track record in attracting significant new commercial businesses at the Tejon Ranch Commerce Center with an approved 20 million square feet of commercial/business park, which 4.8 million is already developed, creating approximately 4,000 jobs. Based on similar factors that are also present on the Centennial site, such as immediate proximity to transportation corridors, as well as reliable water and related infrastructure, comparable economic success can be anticipated for this project. As a balanced mixed use community, Centennial is also a very attractive destination for new employers seeking to locate or remain in the County while providing their employees with walkable housing that is affordable to working families, as well as quality public services ranging from schools to transit. Vast open space reserves at Tejon and in nearby public lands such as Angeles National Forest, creates a unique sustainability model for urbanized development that improves the region’s economy while preserving the rural character of the vast majority of Antelope Valley.
6. Conclusion

We welcome the opportunity to address these and other features of the project during our hearing on December 11.

CENTENNIAL FOUNDERS, LLC,
A Delaware limited liability company

By Tejon Ranchcorp, a California corporation
Its Development Manager

By [Signature]

Greg Medeiros
Vice-President, Community Development
December 7, 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 Correspondence Received October 31, 2018 to November 27, 2018, and Comprehensive Wildfire-Related Response

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 all correspondence the Board has received about the Project between October 31, 2018 and November 27, 2018, and provide a comprehensive response addressing recent California wildfires. As such, enclosed please find the following Exhibits:

**Exhibit 1** Responses to November 16, 2018 Letter from Nicholas Jensen and Other Signatories

**Exhibit 2** Responses to November 26, 2018 Letter from Nicholas Jensen and Other Signatories

**Exhibit 3** Responses to November 27, 2018 Email from Nicholas Jensen

**Exhibit 4** Responses to Form Letters Received October 31, 2018 to November 27, 2018

**Exhibit 5** Comprehensive Fire Safety and Wildfire Response

Thank you for your consideration.

Sincerely,

[Signature]

P.O. Box 1600 | 4436 Lebec Road
Tejon Ranch, CA 93243
561 248 3000 O | 661 248 3100 F
www.tejonranch.com

Tejon Ranch Co. (NYSE: TRC) – a diversified real estate development and agribusiness company
The following responds to the November 16, 2008 comment letter (Comment Letter) to the Board of Supervisors, signed by Center For Biological Diversity, California Native Plant Society, Defenders of Wildlife, Earthjustice, Idle No More Southern California, SoCal 350 Climate Action, and Wild Heritage Planners (collectively, Commenter).

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 CEQA obligates the County to prepare and recirculate a supplemental EIR because, in Commenter’s view, 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. See Comment Letter at 4. As explained below, Commenter’s claim is without merit because it is based on factual misrepresentations, misstatements of applicable law, and relies on a California Air Resources Board (CARB) staff letter concerning an unrelated project that is itself 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.

The Centennial EIR’s GHG Analysis Under Threshold 21-1

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 activities,” citing both CEQA Guidelines § 15064.4(b)(3) and CARB’s Statement of Reasons. See (2015) 62 Cal.4th 204, 229 (“Newhall”). Subsequently, in Association of Irrigated 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 pages 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 page 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 Centennial Draft 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 Centennial Draft 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).

Commenter’s Argument That None of Centennial’s GHG Emissions are Covered by Cap-and-Trade Is Inconsistent with Controlling Case Law and CARB’s Statement of Reasons

At the heart of the Comment Letter 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.” See Comment Letter at 2, 3. Commenter’s only support for this claim is a September 7, 2018 letter written by CARB staff that comments on an EIR for the unrelated World Logistics Center warehouse and logistics facility (WLC) proposed in the City of Moreno Valley (CARB Letter). Like the Comment Letter, the CARB Letter asserts 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.

Both Commenter and CARB 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. See Commenter Letter at 2; see also, CARB Letter at 11-12. 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. Setting aside the fact that this argument attempts to read into CEQA Guidelines
§15064.4(b)(3) an evidentiary standard that is absent from the guideline text,\(^1\) 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 distributors [in the Cap and Trade program].”\(^2\)

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. CARB’s 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

---

\(^1\) CARB has no legal authority to amend the CEQA Guidelines. Per Public Resources Code § 21083(f), the CEQA Guidelines may only be amended by the Secretary of Resources following compliance with the California Administrative Procedure Act.


Exhibit 1 to December 7, 2018 Tejon Ranch Company Letter to the Los Angeles County Board of Supervisors
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.³

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.”⁴ Given this administrative record, CARB cannot prop up its clumsy attempt to avoid application of the Court of Appeal’s holding in AIR by now claiming that Cap-and-Trade was not designed to cover emissions generated by the downstream combustion of fossil fuels supplied in California.

Commenter’s Claim that the Centennial EIR Fails to Identify GHG Mitigation is False

Commenter inaccurately claims that the Centennial EIR “does not provide mitigation for” Centennial’s GHG emissions. See Comment Letter at 1. This claim is false. As demonstrated by the CEQA Findings of Fact included as Attachment O to the Board of Supervisor’s December 11, 2018 hearing package, the Centennial EIR identifies no less than 48 different CEQA mitigation measures to reduce Centennial’s GHG emissions to the extent feasible. These measures address a variety of GHG emission sources, including, but not limited to, transportation fuel consumption, electricity consumption, solid waste diversion, vegetation conversion, wastewater generation and treatment, water use, and natural gas consumption. The project Development Agreement further obligates Centennial to achieve a “net zero carbon for the electric sector” performance standard for all public and private project facilities. Per this “net zero electricity” standard, Centennial must ensure that the carbon emissions created to produce electricity consumed by Centennial is offset with an equivalent amount of carbon emission reductions that result from quantified greenhouse gas emission reductions. Thus, Commenter’s claim that the Centennial EIR “does not provide mitigation” for Centennial’s GHG emission is factually inaccurate and should be disregarded.

Commenter further claims (falsely) that it is the Applicant’s view that, if Centennial’s “GHG emissions are covered by Cap-and-Trade somewhere upstream, then they don’t need to mitigate or otherwise reduce these emissions.” See Comment Letter at 2. In point of fact, neither the Applicant nor the Centennial EIR has ever asserted that Centennial need not reduce emissions generated by the consumption of fossil fuels, even if upstream fuel suppliers are covered entities under Cap-and-Trade. To the contrary, the vast majority of GHG mitigation measures identified in the EIR directly target emissions generated by the consumption of fuels sourced from upstream suppliers, even though such emissions are covered by Cap-and-Trade. These measures include, but are not limited to, requirements that Centennial install numerous EV charging stations, implement transportation demand management strategies, generate on-site renewable energy, install energy efficient

³ FSOR at 177-178.
⁴ Id. at 655.
appliances and HVAC systems, install solar heating for pools and spas, and enforce limits on construction vehicle idling, among other mandates. These mitigation measures are clear evidence that the Centennial EIR does not avoid mitigation on the basis that some project GHG emissions are covered by Cap-and-Trade, despite Commenter’s false claim to the contrary.

Notably, the GHG mitigation program identified in the Centennial EIR distinguishes it from the WLC EIR at issue in the CARB Letter. As discussed in the CARB Letter, the WLC EIR determined that it need not analyze or mitigate GHG emissions associated with the Project’s consumption of fossil fuels because such emissions are covered by Cap-and-Trade. See CARB Letter at 1, 5. In stark contrast, the Centennial EIR fully quantifies and analyzes GHG emissions associated with the project’s consumption of fossil fuels, and it identifies feasible mitigation to reduce such emissions, even though the emissions are also covered by Cap-and-Trade. The CARB Letter also complains that the WLC EIR did not analyze the WLC project’s consistency with the regional SB 375 sustainable communities strategy. Id. at 5. The Centennial EIR, however, did undertake this SB 375 analysis and determined that Centennial is consistent with the SCAG’s regional RTP/SCS. Given the marked differences between the Centennial EIR and the WLC EIR, Commenter’s reliance on the CARB Letter is specious at best, even without reference to the CARB Letter’s unfounded claims regarding the scope of Cap-and-Trade.

Conclusion

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 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(h)(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. Moreover, in light of controlling law, Commenter’s claim that CEQA requires preparation of a supplemental EIR for the Centennial project must fail.
Exhibit 2 - Responses to Letter from Nicholas Jensen, PhD, of the California Native Plant Society, and Multiple Other Signatories, Re: "Oppose the City-sized 'Centennial' Sprawl Development in L.A. County," dated November 26, 2018

On November 26, 2018, representatives from the California Native Plant Society, Center for Biological Diversity, Great Old Broads for Wilderness - Middle California, Tri-County Watchdogs, Wild Heritage Planners, Defenders of Wildlife, Investing in Place, Center on Race Poverty & the Environment, Center for Community Action and Environmental Justice, Los Angeles Walks, Idle No More SoCal, Los Angeles Audubon Society, and SoCal 350 Climate Action sent a letter to the Board urging rejection of the Project. The below responses to the letter are organized by topics referenced in the letter.

Response to Introductory Remarks:

The introductory portion of the letter describes the Project, characterizes it as "20th century sprawl", and direly predicts that it would disproportionately increase air pollution, traffic and greenhouse gas emissions while destroying "thousands of acres of irreplaceable natural resources." It also advocates for rejection of the Project in favor of infill development. These assertions are incorrect and the County disagrees with the positions taken in the letter, as the County has extensively addressed in the Project’s Environmental Impact Report ("EIR") prepared per the requirements of the California Environmental Quality Act ("CEQA").

As is addressed in Final EIR, Volume 2, Responses to Comments F.8-20 and F.8-72, the Project has been situated 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 (2016 RTP/SCS) and the County’s Antelope Valley Area Plan (AVAP) for the purpose of sustainably accommodating regional growth projections in a 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 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” (see Final EIR, Volume 1, Comment D.4-2). In making this determination, SCAQMD evaluated the Project from a "regional perspective" (see Final EIR, Volume 1, Comment D.4-1). When regional planning priorities are taken into consideration, it is clear that the Project cannot fairly be characterized as “classic sprawl.” Rather, it addresses regional housing needs, is consistent with the 2016 RTP/SCS (including by implementing a balanced land use plan rather than an all-infill plan which would have caused significant and unavoidable displacement impacts for lower-income residents and caused significant congestion in urban infill areas), the County’s General Plan, and the AVAP, and Smart Growth strategies. For further discussion, please see the Final EIR, Volume 2, Responses to Comments F.8-20 and F.8-72.
With regard to the assertion that the Project would destroy “thousands of acres of irreplaceable natural resources,” the County has also thoroughly addressed this issue. First, in recognition of the biological importance of Tejon Ranch, the project Applicant voluntarily agreed to permanently preserve 90 percent of the Ranch determined to be the most ecologically important, and limit Ranch development to the less than 10 percent of the Ranch determined to be developable without compromising biological integrity and biological values. The Project has relatively limited impact on oak woodland and riparian habitat, and fully mitigates its impacts to grasslands (please refer to Draft EIR, Section 5.7.6, Environmental Impacts, and Section 5.7.7, Mitigation Measures). 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 affected by the Project, as well as particular individual biological resource values. (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. Further, there is no wildlife movement unique to the Project site, and wildlife movement studies conducted in the Project region reveal that the site is not situated within a crucial wildlife movement corridor; rather, local movement is largely retained through open space corridors scattered throughout the site, and regional wildlife movement largely occurs, based on the literature, west of the Project site. (Draft EIR, pages 5.7-23, -55 to -64, -164 to -166; Final EIR, Volume 1, Response to Comment F.5-5.) The Project site itself does not represent high quality long-range movement habitat due to the existing California Aqueduct barrier and the overall lack of cover. Wildlife are not drawn to the Project site, because it generally lacks attractive resources, topography, and cover. (Id., at 5.7-63, -64.) Wildlife movement occurring from the Tehachapi Mountains to the San Gabriel Mountains south of the Project is much more likely to cross west of the Project site. The Project site is therefore, likewise not “irreplaceable” with regard to wildlife movement or habitat connectivity.

Response to “The Centennial Project Represents 20th Century-Style Sprawl Development”

With regard to average external trip lengths and residents’ commutes, consistent with Los Angeles County and California policies, the Project has been designed to encourage local trips and to reduce incentives for trips external to the project for work, shopping and other activities. The EIR discloses that the average external trip length would be 45.9 miles in length, and that 52 percent of all trips would be external to the Project site - However, these trip lengths are conservative because they do not reflect the trip reduction measures to be implemented by the Project that will encourage trips by walking, biking, and transit. (Final EIR, Volume 2, Response to Comment F.8-23.) The length of external trips estimated for the Project is not atypical of communities that are relatively far from other locations that provide comparable amenities, services and employment. In these instances, local work trips and non-work-related trips generally are shorter and internal to the community and non-local

Exhibit 2 to December 7, 2018 Tejon Ranch Company Letter to the Los Angeles County Board of Supervisors
work trips are relatively longer to access external employment opportunities. Please see Final EIR, Volume 2, Responses to Comment F.8-23 and F.8-415 for further discussion of this topic.

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 51-9 through 51-13 and pages 51-16 through 51-19 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.

With regard to wind and the risk of wind-driven fires, the EIR recognizes that the Project site sometimes experiences high wind events, and this has been taken into account in Project impact analyses, including with regard to fire risk. (Draft EIR, pages 51.11-23, 5.3-17) With regard to the fiscal impact of emergency and other public services, and the assertion that the

Exhibit 2 to December 7, 2018 Tejon Ranch Company Letter to the Los Angeles County Board of Supervisors
Project would drain resources or require far-away service facilities to serve its residents, this is incorrect. As discussed in the Draft EIR, such as in Section 5.16 Fire and Law Enforcement and Section 5.17 Other Public Services, the Project is responsible for providing infrastructure and services and would not create negative fiscal impacts on surrounding communities. Rather, the Project will provide significant net economic benefits to Los Angeles County, and will bring much-needed services to the small communities nearby.

Response to “The Centennial Project Negates Efforts to Reduce Greenhouse Gas (GHG) Emissions”

This portion of the letter asserts that the Project would adversely impact California’s ability to meet its GHG emissions reduction goals, and that the EIR does not adequately analyze, disclose, and mitigate for GHG emissions. This letter notably provides no evidence to support its assertions, and the County has appropriately and thoroughly both analyzed impacts and identified all feasible mitigation to reduce GHG emissions impacts. As discussed in Final EIR, Volume 2, Responses to Comment F.8-79 and F.8-96, the Project’s potential GHG impacts were fully disclosed in Section 5.21 of the Draft EIR. Moreover, the EIR includes mitigation measures which require compliance with a non-exclusive list of laws and regulations requiring GHG reductions in equipment, activities, facilities and services associated with the project (MM 21-20) The EIR also includes 45 additional mitigation measures to reduce GHG emissions from project operations and/or construction activities (MMs 10-1, 10-25, 10-26, 11-1 through 11-7, 13-6, 14-1, 17-9, 17-10, 18-1, 18-2, 19-1 through 19-5, 20-2.1, 20-2.2, 20-3.1 through 20-3.3, and 21-1 through 21-19). In addition, the Specific Plan includes additional commitments to sustainable design and operational practices which minimize GHG emissions, as detailed in Final EIR, Volume 2, Response to Comment F.8-204, and mitigation measures were revised in response to comments on the Draft EIR to further reduce the Project’s GHG emissions. See revised and added mitigation measures as set forth in Final EIR, Responses to Comments F.8-95, F.8-204, F.2-2, F.2-5, F.3-29, F.3A-46, F.8-189.

This portion of the letter also suggests that the Project should be required to achieve “net-zero” GHG emissions. However, CEQA does not require projects to do so. In Center for Biological Diversity v. Department of Fish and Wildlife, S217763 (Newhall), the Center for Biological Diversity (a signatory to this letter), argued that the court should adopt a “zero net” approach to mitigating for GHG impacts on the basis that it is required by CEQA. The Supreme Court declined to do so and instead identified GHG compliance pathways that included compliance with laws, compliance with SB 375, and compliance with climate action plans.123 The “net zero” approach was also considered and rejected by the Office of Planning and Research, the expert state agency for implementing CEQA.4 Further, “net-zero” emissions would be infeasible for the Project. For further discussion of the “net-zero” approach, including why it is not required and is infeasible, please see Final EIR, Volume 2, Responses to Comments F.8-87, F.8-96, and F.8-204.

1 Newhall, Opening Brief on the Merits, pp. 59-70,
2 Id., Newhall’s Answer Brief on the Merits, pp. 37-45
3 Id., p. 229
4 14 CCR §15000; 15126.4(c)

Exhibit 2 to December 7, 2018 Tejon Ranch Company Letter to the Los Angeles County Board of Supervisors
Response to "The Centennial Project Negates Efforts to Reduce Air Pollution in Southern California"

This portion of the letter asserts, with no evidentiary support, that the Project “will result in a significant decrease in regional air quality.” This assertion is not supported by the facts. Rather, as noted above, the Project has been sited and designed to sustainably accommodate regional growth projections in a 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 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” (see Final EIR, Volume 1, Comment D.4-2).

Specifically with regard to particulate matter, under existing pre-Project conditions, the SCAQMD is in federal and state nonattainment for particular matter, and the AVAQMD is in state nonattainment for PM₁₀. (Draft EIR, pages 5.11-22 to -28) As discussed in Draft EIR Section 5.11, “Particulate matter in the AVAQMD tends to be primarily fugitive dust. This dust appears to be generated by both local sources and by region-wide dust during moderate to high wind episodes. These regional episodes tend to be multidistrict and sometimes interstate in scope. The AVAQMD has identified the local sources of fugitive dust to be primarily unpaved road travel; construction and local disturbed areas of soil concentrated in the urban populated areas in the district; and seasonal agricultural operations”; and “Particulate levels in the area are due to natural sources (such as wind), grading operations, and motor vehicles”. (Draft EIR, pages 5.11-6, -26) Under Threshold 11.2, which asks if the proposed project would expose sensitive receptors to substantial pollutant concentrations (which includes particular matter), a health risk analysis was completed to evaluate the human health impacts, and concludes that risks at future Project residences and other sensitive areas are below applicable thresholds. (Draft EIR, page 5.11-71 to -72) Further, MMs 11-10 and 11-11 have been incorporated to minimize any Project-related impacts. Impacts would therefore be less than significant. (Draft EIR, page 5.11-72) For more in-depth discussion with regard to particulate matter and Project-related impacts, please see Final EIR, Responses to Comments F.8-189, F.8-196.

Response to "The Centennial Project Will Destroy Irreplaceable Habitat for Plants and Animals"

The pronghorn is not on the CDFW list of Special Animals, and CDFW in fact occasionally issues permits for hunting of the Antelope Valley pronghorn population, but the Draft and Final EIR specifically acknowledge that there is an interest in maintaining this herd. (Draft EIR page 5.7-153; Final EIR, Volume 1, Response to Comment B.4-35) The EIR therefore provides an impact analysis which is consistent with standard practices for sensitive species and the best available scientific information, including on-site observations, in suitable habitat areas. Pronghorn have reportedly been seen on occasions in random locations on the
project site but the majority of those observations are known to be primarily in the western portion of the site (upper Oso Canyon in particular), which is preserved mitigation open space. Since release of the Draft EIR, additional population distribution information has also been obtained from the Tejon Ranch Conservancy and is presented in the Final EIR (see Final EIR, Exhibit B.4-34, which indicates the primary usage area for pronghorn along the Tehachapi foothills, predominantly northeast of the Project site). As noted in the Final EIR, the Project’s crossing opportunity under SR-138 connecting areas of appropriate habitat would serve the pronghorn. (Final EIR, Response to Comment B.4-36) Further, the Ranchwide Management Plan requires the Project Applicant to work with the Tejon Ranch Conservancy to identify and implement potential enhancement measures for pronghorn that are also supported by CDFW. (Final EIR, Response to Comment B.4-35) The EIR adequately assesses pronghorn impacts and the determination of less than significant impacts remains appropriate inclusive of all available species data. For further discussion of pronghorn antelope, please see Final EIR, Responses to Comments B.4-34 to -37, F.8-165 to -167, and ADD-F.2-18.

With regard to California condor, the EIR analyzed potential Project impacts on the condor in depth. Independent studies analyzing potential Project utilization by the condor were conducted by experts on the species (Bloom 2009) and were included as attachments to the Draft EIR (Appendix 5.7-B, Birds-6). As noted on page 2-42 of the Final EIR, condors are extremely infrequent visitors to the Project site. The Project site is on the eastern edge of the historic condor range, and some fly-overs have occurred, although the core flight paths are located to the west of the Project site. Expert analysis of the Project site concluded that thermal updraft is likely not sufficient over the site to propel the condor into flight. Due to the large size of the California condor, areas of at least moderate topographical relief seem to be required for both thermals and updrafts to facilitate take-off (Allen et al. 2016). For this reason, as well as the record of occurrence, the Project site is not considered important foraging grounds for the species. Observations of flying condors prior to 1987 indicate that, on the few instances that they were known to have flown over valley floor habitat (including the Centennial Project site), the birds were usually flying high over the landscape, probably at an altitude of over 1,000 feet (Bloom 2009). During these flights, the condors rarely, if ever, landed and their movements appeared transitory (Bloom 2009). To date, four GPS location points out of many thousands were in the vicinity of the Centennial Project site (Bloom 2009). The EIR correctly concluded that impacts to condor are less than significant. The USFWS analysis supports this conclusion. However, MM 7-6 is included to further ensure that the proposed Project does not result in future impacts on the California condor. MM 7-6 includes measures to protect condors during design of the Project, during construction of the Project, post-Project construction, and includes a homeowner Condor Educational Curriculum. For further discussion specific to California condor, see Draft EIR, Section 5.7, pages 5.7-94, -119, and -120 and Final EIR, Responses to Comments B.4-20 to B.4-23, and F.8-138 to F.8-143.

With regard to tricolored blackbird, as of Draft EIR preparation, the tricolored blackbird was not a State Endangered Species, but rather a Candidate under review for this status. On April 19, 2018, the California Fish and Game Commission authorized the listing of tricolored

Exhibit 2 to December 7, 2018 Tejon Ranch Company Letter to the Los Angeles County Board of Supervisors
blackbird as a "threatened" species. However, the Applicant notes that Candidate species are afforded the same legal protections as state listed species. Therefore, consultation with CDFW will be required. The relevant analysis therefore remains the same under CEQA, and no mitigation measure and analytical updates were required in the Final EIR. The Project will comply with the California Fish and Game Code requirements including consulting with CDFW. The Project would not directly impact the Quail Lake and Holiday Lake (the latter approximately 3.4 miles east of the site, as noted on Draft EIR page 5.7-113), which are both outside the Project site boundary, and sufficient foraging habitat is maintained. All nesting colonies are avoided with the addition of a buffer as well as reduced activities during the breeding season (MM 7-7). For further discussion of tricolored blackbird, please see Draft EIR pages 5.7-19, 5.7-112 through 5.7-114, 5.7-116, 5.7-145, 5.7-148, 5.7-149, 5.7-150, 5.7-151, and 5.7-154, and Final EIR Responses to Comments B.4-18, B.4-43, B.4-70, F.3-14, F.3-15 through F.3-20, F.3A-23 through F.3A-29, F.7-22, F.8-117, F.8-156, and F.8-158.

The other species mentioned in this comment have also been appropriately studied in the EIR, including with regard to presence on and use of the Project site, Project impacts, and identification of feasible mitigation to reduce impacts. This includes American badger (see Draft EIR pages 5.7-50, -51, -53, -54, -98, -126, -153, -175, and -176 and Final EIR, Responses to Comments B.4-29 and F.8-159), burrowing owls (see Draft EIR Section 5.7, pages 5.7-22, -92, -115, -150, -175, -176, Final EIR, Responses to Comments B.4-24, B.4-25, F.8-163 and F.8-164), northern harriers (see Draft EIR pages 5.7-50, 5.7-92, 5.7-117, and 5.7-150), loggerhead shrikes (see Draft EIR pages 5.7-95, 5.7-121, and 5.7-150), California legless lizards (see Draft EIR pages 5.7-110, 5.7-147, 5.7-175, and 5.7-176, and Final EIR Responses to Comments B.4-55, B.4-58, F.8-160, F.8-173, and ADD-F.2-22), and migratory birds (see Draft EIR pages 5.7-112 through 5.7-124, and 5.7-148 through 5.7-151, and Final EIR Response to Comment F.8-162). The County's analysis is thorough and appropriate, and this letter notably provides no evidence to support the assertion that the Project would be a "major threat" to any of the above-mentioned species.

With regard to the Antelope Valley Poppy Reserve, it is approximately 22 miles southwest of the Project site, and the Project site is separated from the reserve by the towns of Neenach and Fairmont. Therefore, the Project is not anticipated to have a significant impact on the preserve, and, therefore, there is no mitigation required to address the preserve. With regard to on-site poppies, impacts to poppies were considered in the analysis of wildflower impacts. With regard to wildflowers, the EIR appropriately discusses their presence on the Project site, and potentially significant impacts to wildflower fields and other special status vegetation types that would result from implementation of the Project would be reduced to less than significant levels with implementation of MM 7-10. For further discussion of wildflowers on the Project site and potential impacts, see Draft EIR, Section 5.7 Biological Resources, pages 5.7-1, -11, -24, -26, -31, -40 to -44, -66, -158 to -160, -162 to -164, and Final EIR, Responses to Comments F.8-114, F.8-119, F.8-123 to F.8-125, F.8-127, and H.21-1, and


Exhibit 2 to December 7, 2018 Tejon Ranch Company Letter to the Los Angeles County Board of Supervisors
Final EIR Section 3.0, pages 3-32 and 3-33. With respect to the assertion that the Project would remove "irreplaceable" habitat, as noted above in the response to introductory remarks in this letter, 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.

This letter expresses a preference for preservation of the entire Project site. However, the Project effectuates the groundbreaking Conservation and Land Use Agreement (Ranchwide Agreement), which the Applicant entered into with Audubon California, the Endangered Habitats League, Natural Resources Defense Council, Planning and Conservation League and Sierra Club (Resource Groups) and the nonprofit Tejon Ranch Conservancy, which allows the Applicant 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 Groups, 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. Of the 12,323-acre Project site, approximately 5,624 acres (or 45.6 percent) are proposed for open space for natural resource protection and greenways. Further, preservation of the entire Project site would impede regional planning goals, including with regard to addressing the region’s critical housing needs, and would undermine the implementation of the SCAG 2016-2040 RTP/SCS and compliance with SB 375.

With regard to groundwater recharge, as discussed on Draft EIR pages 5.18-73 to 5.18-74, groundwater recharge will be maximized by not redirecting any existing watershed flows to other watersheds and by capturing and infiltrating onsite storm and dry period flows in a series of infiltration basins located throughout the Project. As discussed on Draft EIR page 5.2-26, the Project has been designed to maintain undeveloped areas with uncompacted soils to provide opportunities for infiltration of runoff in impervious areas and help to preserve pre-development infiltration, evapotranspiration, percolation, subsurface flow, groundwater recharge, and surface runoff conditions. As discussed on Draft EIR page 5.2-27, development on the Project site is generally located on existing poorly infiltrating soils and avoids soils with higher infiltration rates for flow and volume management and groundwater recharge. The Project’s distributed and parcel-based low impact development and regional Best Management Practices hydrology, flood control and water quality measures will be implemented to provide infiltration capacity for developed areas that affect locations with higher infiltration rates. As discussed on Draft EIR pages 5.2-28 to 5.2-30, in additional to distributed parcel-based low impact development measures that promote infiltration and recharge, a series of regional basins will be constructed, generally with flat, vegetated bottoms that will, in addition to performing other hydrologic, flood, and water quality protective functions, manage excess runoff volumes from the site through infiltration. The locations of the basins are shown on Draft EIR Exhibit 5.2-4.
With regard to carbon sequestration, the Project would result in the conversion of some vegetative cover that currently sequesters carbon. However, as the County has explained, this is appropriately disclosed and analyzed in Draft EIR Section 5.21, Climate Change (pages 5.21-5 and -50). It should be noted, however, that the Project would plant an estimated 35,123 new trees, as required by the County Tree Planting Ordinance, which would result in an estimated long-term sequestration of 24,867 metric tons of carbon dioxide equivalent, as discussed on Draft EIR page 5.21-83.

Response to Closing Remarks

The letter closes by urging the Board to reject the Project, reiterating many of the points already made in the body of the letter. In addition to the responses above, the Applicant would like to reiterate that the Project is consistent with regional planning efforts and will help meet the critical need for housing, that the Applicant has agreed to preserve approximately 90 percent of Tejon Ranch in perpetuity, that the Project effectuates the Ranchwide Agreement to ensure that areas most appropriate for preservation are entirely avoided, and that it will bring a vibrant, walkable, and healthy community and range of services to an underserved area.
Exhibit 3 - Responses to Email from Nicholas Jensen, PhD, of the California Native Plant Society, dated November 27, 2018

On November 27, 2018, Nicholas Jensen sent an email to the Board asserting that the Centennial Specific Plan “puts future residents at risk” of fire danger, citing an attached editorial published in the L.A. Times on November 25, 2018 entitled “Should Paradise be rebuilt?” The email draws false parallels between the community of Paradise and the Project site, and the Project.

First, the editorial describes the recent wildfire in Paradise, California, wherein the “few roads out of town clogged with cars” during the fire and the city and county were known for needing “more evacuation routes.” 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.)

The editorial asserts that rebuilding the community of Paradise would be tantamount to “malpractice” due to access issues, and lack of fire-safe construction and appropriate maintenance. Conversely, Project construction will be orderly and will meet all current and evolving standards for fire safety, protection, and service access. The Project in fact incorporates the fire-safe features suggested in the editorial, including “fire breaks and buffer zones between open space and developed properties,” and “sufficient evacuation routes and the most stringent, fire-resistant construction,” with a “100-foot perimeter of defensible space around…homes to reduce the chance that an ember” will ignite them. Per AVAP Policy PS 1.2, the Project is required to and shall provide sufficient access for emergency vehicles and sufficient evacuation routes for all residents and animals. (Draft EIR, page 5.3-38) Therefore, 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. Per MM 3-9, the Applicant is further required to prepare a Fuel Modification Plan that demonstrates compliance with
regulatory requirements, whose major components will ensure a minimum 20-foot setback from the edge of any structures, an irrigation and transition zone from 20 to 100 feet away, and native brush thinning zone between 100-200 feet away from structures, to reduce fire events and protect open space areas. The County of Los Angeles' stringent standards for appropriate building design and materials would also 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) Finally, the Project's powerlines will be placed underground, preventing utility-related ignitions. (Draft EIR, page 5.20-12)

The designation of fire hazard severity zones is not intended to prevent all development, but rather to help limit wildfire damage to structures through planning, prevention, and mitigation activities/requirements that reduce risk.¹ 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 Very High Fire Hazard Severity Zone, with very small portions each designated High or Medium Fire Hazard Severity Zone. (Los Angeles County General Plan, Figure 12.5) The editorial asks whether some areas are simply too dangerous for home construction, specifically mentioning the Project. However, the Project site is simply not one such area, for all of the above-described reasons and as comprehensively addressed in Exhibit 5 to the Applicant's December 7, 2018 letter to the Board addressing this and other pieces of correspondence received between October 31, 2018 and November 27, 2018.

Between October 31, 2018 and November 27, 2018, the Board received 168 “form letters”, which were prepared by unknown sources and made available to the public for submittal via email. All of the received form letters have been previously received and addressed by the County in the EIR. The Board received 166 copies of a letter which has been addressed in the Final EIR in Responses to Comment Letters ADD-G.63, ADD-G.65, and ADD-G.82. The Board received 1 copy of a letter which has been addressed in the Final EIR in Responses to Comment Letters ADD-G.3, ADD-G.49, ADD-G.61, and ADD-G.66. Finally, the Board received 1 copy of a letter addressed in the Final EIR in Responses to Comment Letter ADD-G.77. None of the form letters received between October 31, 2018 and November 27, 2018 raised new, substantive issues not already addressed thoroughly and appropriately by the County in the EIR.
Exhibit 5- Comprehensive Fire Safety and Wildfire Response

In the wake of recent devastating wildfires in California, and because of the Project site’s fire hazard severity zone designations, community members have expressed concern about risks to the Centennial Project. The Project and Project site are distinguishable from Paradise, California, and the Project will ensure less than significant impacts with regard to fire safety and fire services as is discussed in further detail below, because of Project site access and design, fire services and facilities, construction materials, fuels management and planting requirements, utility undergrounding, and through application of 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.

CAL FIRE and Fire Hazard Severity Zones

As disclosed in the Draft EIR and Final EIR Exhibit 5.3-2, the western and southeastern edges and eastern portions of the Project site are designated by the California Department of Forestry and Fire Protection (CAL FIRE) as a VHFSHZ, the western and central portions are designated as a High Fire Hazard Security Zone (HFHSZ), and the eastern edge is designated as a Moderate Fire Hazard Security Zone (MFHSZ), and 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 5.3-35, -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. These zones are not intended to prevent all development in high or very high fire hazard severity zones, but rather to help limit wildfire damage to structures through planning, prevention, and mitigation activities/requirements that reduce risk.\textsuperscript{1} 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 VHFSHZ, with very small portions each designated HFHSZ 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.\textsuperscript{2} 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)

Site Access and Design, Water Supplies

With regard to the Project and its current designations, as explained in the Draft EIR, current characteristics of the Project site that contribute to its hazard designation include (1) limited

\textsuperscript{1} CAL FIRE, Wildland Hazard and Building Codes Frequently Asked Questions: http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_faqs.

\textsuperscript{2} Id.
access, (2) lack of existing adequate fire flows, (3) topography, and (4) types of vegetative cover. (Draft EIR, page 5.3-33)

However, the four above-identified characteristics of the Project site that contribute to its designation would be addressed as the Project site is developed, as follows and as discussed in Draft EIR pages 5.3-35 to -36:

(1) **Access.** The Project includes an extensive backbone vehicular circulation system that would provide five points of access to the site via SR-138. The design of the Project’s internal circulation system would implement the County standards, as applicable, regarding access (i.e., roadway widths, length of single access streets, cul-de-sac dimensions, street parking restrictions) (see Section 5.10, Traffic, Access and Circulation, for additional discussion of roadway design). Additionally, the Project will incorporate up to four new fire stations within the Project site. Consequently, access would be improved from the existing condition and impacts associated with emergency fire response would be less than significant with incorporation of emergency response requirements (MM 3-7)

(2) **Fire Flows.** Exhibit 4-13, Centennial Project – Conceptual Domestic Water System, shows the Project’s water system that would provide water supplies to support proposed land uses and provide adequate fire flows and pressure to support any fire-suppression activity in the event of wildland or structural fires (refer to Section 5.18, Water Resources, for further discussion of the water system). The proposed water system includes water mains, water tanks, pump stations (where necessary), and fire hydrants to ensure sufficient fire flows and water pressure to meet County of Los Angeles Department of Public Works’ and LACFD’s fire-suppression standards for improved property and development. These standard requirements must be met prior to the approval of building permits; therefore, the Project would implement a water system that would meet all County requirements in support of fire-suppression activities so that less than significant water-related fire hazards would occur.

(3) **Topography.** Topography is connected to wildland fire hazards because steep slopes are not only inaccessible to fire fighting vehicles, but steep canyons can create updraft conditions (much like a chimney) and a fire in a steep canyon can spread rapidly into adjacent areas. Steep canyons that are densely covered with combustible vegetation are especially hazardous. The Project’s land uses would be developed in accordance with fuel modification requirements to ensure appropriate buffer zones for protection from wildfire events (MM 3-9). Areas of the Project site that are undeveloped and contain steep slopes would restrict human access to the use of trails. Despite limited access to the general population, the portions of the site with the greatest topographic relief would be accessible to fire-fighting equipment via helicopter, other air transport access, and existing unpaved fire roads. As required by the LACFD, upon their Project-level review (e.g., tract map review), clearance for fire access roads

Exhibit 5 to December 7, 2018 Tejon Ranch Company Letter to the Los Angeles County Board of Supervisors.
and gates would be incorporated into developed areas (for more on subsequent approvals, see “Evolving Requirements and Subsequent Approvals,” below). Implementation of the Fuel Modification Plan (MM 3-9) for the Project would ensure that impacts would be less than significant

(4) **Vegetative Cover.** The majority of residential development is proposed for the flatter portions of the Project site. Some residential development, however, is proposed in areas that would be adjacent to large open space areas with moderate vegetative cover. The plant communities that make up this cover are highly combustible and, prior to mitigation, would therefore present a high fire hazard and pose a potentially significant impact to development in these areas. With MM 3-9 for fuel modification requirements, impacts related to fire hazards would be less than significant.

**Fire Services and Facilities**

As required by MMs 16-1 through 16-3, the Project will provide within the Project site up to four new fire stations each staffed by a minimum four-person engine company. In Village 1, one fire station is proposed east of the National Cement Plant Road. The second fire station is proposed in Village 4, and the third fire station is proposed in Village 7, with the location of a potential fourth station to be determined. These new fire stations are projected to provide an average five-minute response time for the first arriving unit for fire and eight minutes for the advanced life support (paramedic) unit on the site at Project buildout. This is consistent with the County of Los Angeles Fire Department’s (LACFD’s) goals for response times in urban areas. Ultimately, the LACFD would approve the final station site locations, and the Applicant would construct and equip the fire stations (MM 16-3). The LACFD has indicated that the proposed fire stations on the site would provide adequate fire service to the Project. Moreover, per MM 3-7, the Project must prepare an Emergency Response Plan for LACFD approval and, per MM 3-8, the Project must prepare a Traffic Control Plan in accordance with the California Manual on Uniform Traffic Control Devices for Caltrans approval. Consequently, access to, from, and in the vicinity of the Project site will be substantially improved from the existing condition.

In addition to the four proposed fire stations to be constructed as part of the Project, additional fire protection services would be provided by the closest available LACFD response units listed in Draft EIR Table 5.16-1. (Draft EIR, page 5.16-7) Further, in the event of a significant fire event such as a wildfire, if within the jurisdiction of the LACFD, the Project would be served by the resources of the LACFD as a whole instead of just the station nearest to the site. (Id.) In the case of a more significant incident requiring additional fire protection resources, as discussed on Draft EIR page 5.16-8, the LACFD participates in a statewide mutual aid system that allows unaffected fire agencies to voluntarily provide aid to other agencies, local governments, operational areas, and the State. The State of California also participates in a nationwide mutual aid system (County of Los Angeles 2012). In addition, the LACFD has automatic mutual aid agreements with the Kern County Fire Department, the Ventura County Fire Department, and the United States Forest Service (USFS), which would allow for these other fire agencies to respond to fire incidents at the site and for the LACFD.
to respond to fire incidents in Kern County, Ventura County, and the Angeles National Forest (LACFD 2015b). Specifically with regard to the Angeles National Forest, it would also have far greater access to fire protection and emergency services in the vicinity of Project site than currently exists. Such access will contribute to LACFD’s performance of its obligations under the Cooperative Fire Protection Agreement Between The County Of Los Angeles Fire Department And The U.S. Forest Service Angeles National Forest (Mutual Aid Agreement), approved by the Los Angeles County Board of Supervisors on December 20, 2016. The purpose of the Mutual Aid Agreement is to provide for cooperation between LACFD and U.S. Forest Service Angeles National Forest (ANF) in the prevention, detection, and suppression of wildland fires, fuels treatment and prescribed fires with both agencies’ respective fire protection areas. The Mutual Aid Agreement also describes the conditions in which “mutual aid” periods are established to provide resources to each on a non-reimbursable basis, as well as the conditions of “Assistance by Hire” on a reimbursable basis. The Project’s fire service improvements described above will significantly enhance the LACFD’s ability to perform its obligations under the Mutual Aid Agreement to the benefit of the ANF in the vicinity of the Project site.

Fuels Management and Planting Requirements

With regard to vegetative cover, the majority of residential development is proposed for the flatter portions of the Project site. Some residential development, however, is proposed in areas that would be adjacent to large open space areas with moderate vegetative cover. Under existing conditions, the plant communities that make up this cover are highly combustible and would therefore present a high fire hazard and pose a potentially significant impact to development in these areas. As development of the Project site proceeds, however, fire hazards associated with the natural vegetative cover would be eliminated through its replacement with urban landscape vegetation, which is irrigated and less combustible than the existing vegetation. (Draft EIR, page 5.3-36.) Indeed, the Project’s proposed Specific Plan includes a landscaping plant palette comprised of many plant species specifically selected for their fire resistance and requires that the Project’s final plant palette be approved by the LACFD. (Specific Plan, p. 3-42, Table 3-8.)

Further, the Project requires preparation and implementation of a Fuel Modification Plan. The Fire Code contains minimum standards to safeguard the public’s safety and welfare, including a requirement for fuel modification plans. Fuel modification plans must be submitted and have preliminary approval prior to any subdivision of land, or have final approval prior to the issuance of a permit for any permanent structure used for habitation, and must be reviewed by the Forestry Division of the LACFD for defensible space, fire safety, and compliance with Section 325.2.1, 325.2.2, 325.10, and 503.2.1 of the Fire Code, LACFD’s fuel modification guidelines, and California Code of Regulations, Title 14, Division 1.5, Chapter 7, subchapter 2. (Draft EIR, pp. 5.3-30, -31.) The EIR describes the components of the Fuel Modification Plan as follows:

“A fuel modification plan consists of three sequential zones where combustible native or ornamental vegetation has been modified and/or partially or totally replaced with drought-tolerant, low-fuel-volume plant species. Fuel
modification zones are designed to protect homes from wildfire by limiting and reducing the amount of fuel available for a wildfire. The reduction in available fuel affects the flame lengths and amount of heat produced by the fire and eliminates landscape areas where embers can ignite vegetation. Each zone should be designed so that the amount of fuel is reduced and the moisture in the plants is increased the closer to a structure. The details of fuel modification plans vary in complexity and reflect the fire history; the amount and type of vegetation; the arrangement of the fuels; the topography; the local weather patterns; and the construction, design, and placement of structures (LACFD 2015). The following is a generalized fuel modification plan and associated zones (LACFD 2011):

**Zone A** is a minimum 20-foot setback zone from the edge of any structures; it is adjacent to structures and should offer protection from intense flames through either properly maintained, irrigated plants with high moisture content, or through walkways, gravel, stone, paved surfaces, or water features to create breaks in the fire’s path.

**Zone B** is the irrigation zone/transition zone that extends from the edge of Zone A up to 100 feet from structures; a large percentage of existing vegetation may be removed and replaced with irrigated, fire- and drought-resistant plants. It may have detached structures and may contain some native vegetation if spaced according to the planting guidelines that create a transition to the native brush and thinning zone (Zone C).

**Zone C** is the native brush thinning zone and, if applicable, extends from the edge of Zone B up to 200 feet from structures. Vegetation will consist mainly of native plants with appropriate thinning and spacing; adequately spaced ornamental shrubs and trees are allowed (if approved by LACFD) but generally not recommended due to water conservation goals. The objective of this zone is to slow the rate of fire spread, reduce flame lengths, and minimize the intensity of the fires prior to reaching irrigated zones (i.e., Zones A and B) or the structure."

(Draft EIR, pages 5.3-31 and -32)

The characteristics of each zone and the landscaping elements appropriate in and prohibited in each is further described in the Specific Plan. For example, in Zones A and B, irrigation by automatic or manual systems shall be provided, and landscaping shall consist largely of green lawns, ground covers and adequately spaced shrubs and trees. (Specific Plan, pages 3-98, -99.) All plants shall be inherently fire resistant and spaced appropriately, most trees are generally not recommended and some species are expressly prohibited within 10 feet of combustible structures, and vines and climbing plants are prohibited on any combustible structure. (Id.) In Zone C, irrigation systems are not required, and landscaping and vegetation may consist of existing, native plants, adequately spaced ornamental shrubs and trees, or both. (Specific Plan, page 3-99.) There may also be replacement landscape planting
in Zone C, with ornamental or less flammable native species, to meet minimum slope coverage requirements of County Public Works or Parks and Recreation Landscape or Hillside Design Guidelines. (Id.) Existing, native vegetation in Zone C will be controlled by thinning and removal of species constituting a high fire risk, and fuel loads shall be reduced by pruning up the lower 1/3 of remaining trees and shrubs and removing dead wood. (Id.) Trees should be limbed up to at least 6 feet above bare earth and a minimum of 3 times the height of underlying plant material, and general spacing for existing, native shrubs is 15 feet between the edge of canopies. (Id.)

With regard to the location of fuel modification zones, the EIR indicates that the Fuel Modification Zone for the Project currently extends 200 feet from all structures, and the three fuel modification Zones A-C would comply with the above detailed descriptions. (Draft EIR, page 5.3-37.) Preliminary discussions with the LACFD indicate that, due to a variety of variables such as topography and nearby vegetation, it may be appropriate to utilize a fuel-modification buffer that is less than 200 feet, and the extent and location of the fuel zone clearance area, along with conditions under which the setback may be reduced, would be finalized with LACFD review and approval of the Fuel Modification Plan. (Id.) Based on conversations between the Applicant and the LACFD, the buffer from structures for the majority of the Project site would be 100 feet because the Project site is predominantly characterized by annual grassland, which is low combustible vegetation. (Id.) The 100-foot setback from structures is likely more appropriate for the majority of the property, while in some instances, an alternative compliance of a 150-foot setback from the structure may be appropriate, especially in cases where a number of trees are in the immediate vicinity of lots but are at a grade uphill from the lots. (Id.) Figure 3-21 of the Specific Plan depicts landscape zones, including the Transition Zone in which many fuel modification zones are located. Figure 3-22, Typical Transition Zone, depicts the typical composition of Fuel Modification Plan Zones A-C. The Specific Plan at page 3-99 also describes the relative sizes and extents of each zone where the setback is 200 feet, 150 feet, and/or 100 feet.

With regard to plant composition in the fuel modification zones, in accordance with the Landscape Plan for the Project (see MM 7-13 in Section 5.7, Biological Resources), the Fuel Modification Plan (see MM 3-9) will utilize a plant palette that is tailored to the unique environmental conditions of the Project site and that borrows extensively from the existing landscape. (Draft EIR, page 5.3-37.) This will allow for both native and adopted species of oaks, willows, cottonwoods, and grasses. The design of this plan would take the Project site’s topographical features into consideration. Transitional slopes and some greenways would be enhanced with regionally appropriate species that relate to the historic background of this region such as stone fruits (i.e., peaches, plums, avocados) and orchards (i.e., citrus and nuts). Furthermore, species selected for modification would be adapted to the conditions found on the Project site by surviving hot, dry summers without high irrigation demands. A partial species list includes evergreens and deciduous trees that may be modified by the Community Forester in consultation with County staff biologists. (Id.) Specific Plan Table 3-8, Plant List, provides the botanical name, common name, water requirements, native status, inherent fire resistance, height, and potential for use in Fuel Modification Plan Zones A-C for

Exhibit 5 to December 7, 2018 Tejon Ranch Company Letter to the Los Angeles County Board of Supervisors.
all plants being considered as part of the Project plant palette. There is also a list of prohibited plants. (Specific Plan, page 3-50.) The final plant palette for fuel modification zones will be approved by the LACFD. The LACFD also provides a pre-approved plant list and plant selection guidelines by zone on its website, which provides further information to the public regarding expected components of the Fuel Modification Plan.

Utility Undergrounding

Several large, recent wildfires have been caused by accidents or maintenance issues with overhead powerlines. The Project will 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 of Oso Canyon. 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.

Construction Materials

With regard to the ignition potential of Project structures, a major purpose of designating fire hazard severity zones is to identify the appropriate requirements for building materials. The Project would comply with State law and with all County requirements related to development in a designated VHFHSZ or HFHSV. As discussed in the EIR, due to the Project

---

3 Id., Appendix 4.0-A, pp. 3-43 to -49

Exhibit 5 to December 7, 2018 Tejon Ranch Company Letter to the Los Angeles County Board of Supervisors.
site's designations, it must comply with the County of Los Angeles' standards in "Materials and Construction Methods for Exterior Wildfire Exposure" of the Building Code (Title 26) and in the Fire Code (Title 32), which include but are not limited to the following requirements:

- All roof coverings shall be of fire retardant Class A materials. Wood-shingle and wood-shake roofs are prohibited in Very High Fire Hazard Severity Zones (VHFHSZs) regardless of classification (Section 704A.1.2).

- Where the roof profile allows a space between the roof covering and roof decking, the spaces shall be constructed to prevent the intrusion of flames and embers; shall be firestopped with approved materials; or shall have one layer of No. 72 American Society of Testing and Materials (ASTM) cap sheet installed over the combustible decking (Section 704A.1.2).

- Ventilation openings shall be constructed on the underside of eaves and cornices. The Building Official may accept or approve special eave and cornice vents that resist the intrusion of flame and burning embers (Section 706A.3 et. seq.).

- Exterior windows, window walls, glazed doors, and glazed openings in exterior doors shall be multi-pane glazing units with a minimum of one tempered pane, or glass block units, or have a fire-resistance rating of not less than 20 minutes, when tested according to ASTM E 2010, or they shall conform to the performance requirements of the Office of the State Fire Marshall (SFM) 12-7A-2 (Section 704A.3.2.2).

- Spark arresters constructed with heavy wire mesh or other noncombustible material with openings not to exceed ½ inch shall be provided in chimneys of any fireplace, barbecue, incinerator, or any heating appliance in which solid or liquid fuel is used (Section 326.12.2).

- Clearance of brush and vegetative growth shall be maintained (Section 325.2). (Draft EIR, pages 5.3-32, -33)

_Evolving Requirements and Subsequent Approvals_

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. (Draft EIR, page 5.3-37)

There are also many further points in time at which Project development will be reevaluated to ensure that no new or more significant impacts (including fire-related) 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

Exhibit 5 to December 7, 2018 Tejon Ranch Company Letter to the Los Angeles County Board of Supervisors.
highest level, the 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 and discretionary, quasi-adjudicatory approval without which development is not permitted to proceed. TTM serves 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, evacuation and safety planning, 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, and that key Project necessities like water supply continue to be adequate. Indeed, a TTM application must be denied if 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 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

---

4 Specific Plan, page 4-22.
6 Id.
7 Id.
8 Government Code Section 66410, et seq.
10 Government Code Section 66474.
available, and (c) that ingress and egress for the subdivision meet all applicable road standards for fire equipment access.\textsuperscript{11} 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.\textsuperscript{12}

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.\textsuperscript{13} The Hearing Officer or Regional Planning Commission will 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.

With regard to mitigation measure requirements, 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 determine whether any of the circumstances listed in CEQA Section 21166 will require additional environmental review prior to any map approval. These circumstances include:

(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.

This approval 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.\textsuperscript{14} 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.\textsuperscript{15} 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

\textsuperscript{11} Government Code Section 66474.02(a).
\textsuperscript{12} Specific Plan, pages 4-12, -13.
\textsuperscript{13} Specific Plan, page 4-12.
\textsuperscript{14} Specific Plan, page 4-18.
\textsuperscript{15} Specific Plan, page 4-18.

Exhibit 5 to December 7, 2018 Tejon Ranch Company Letter to the Los Angeles County Board of Supervisors.
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 met, including with regard to fire safety, and that there is no possibility of inadvertent, new, or worse environmental impacts than have been studied in the EIR.