

FINAL ENVIRONMENTAL IMPACT REPORT

AIDLIN HILLS PROJECT

LOS ANGELES COUNTY, CALIFORNIA

STATE CLEARINGHOUSE No: 2014091027

COUNTY PROJECT No. 00-136
VESTING TENTATIVE TRACT MAP 52796
CONDITIONAL USE PERMIT 00-136
OAK TREE PERMIT 00-136

April 2016

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OAK TREE PERMIT 00-136

Prepared For:

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April 2016

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1. INTRODUCTION

1. INTRODUCTION

This document is the Final Environmental Impact Report (EIR) for the proposed Aidlin Hills Project (Project). This document together with the Draft EIR and its technical appendices comprise the Final EIR. The document has been prepared by the County of Los Angeles (County) in accordance with the California Environmental Quality Act (CEQA).

The Final EIR is required under Section 15132 of the *State CEQA Guidelines* to include the Draft EIR, comments and recommendations received on the Draft EIR, the responses of the lead agency to significant environmental issues raised by those comments in the review and consultation process, and any other relevant information added by the lead agency (including minor changes to the Draft EIR). A Mitigation Monitoring and Reporting Program (MMRP) is also required, which can be either a separate document, or, as in this case, included in the Final EIR.

The evaluation and response to comments is an important part of the CEQA process as it allows the following: (1) the opportunity to review and comment on the methods of analysis contained within the Draft EIR; (2) the ability to detect and correct any omissions that may have occurred during preparation of the Draft EIR; (3) the ability to check for accuracy of the analysis contained within the Draft EIR; (4) the ability to share expertise; and (5) the ability to discover public concerns.

This document provides revisions to the Draft EIR made in response to comments, staff review, and/or changes to the Project. These revisions also correct, clarify, and amplify the text of the Draft EIR, as appropriate, but do not alter the conclusions of the Draft EIR.

1.1 ENVIRONMENTAL REVIEW PROCESS

In accordance with Section 15050 of the *State CEQA Guidelines*, the County is the lead agency that had prepared both the Draft and Final EIR for the Project, known as Aidlin Hills Project. Pursuant to the provisions of Sections 22.60.174 and 22.60.175 of the County Code, the community was appropriately notified by mail, newspaper, property posting, library posting and on the Department of Regional Planning's (DRP) website of the January 11, 2016 Hearing Examiner hearing that was conducted on the Draft EIR by a DRP Hearing Examiner. A newspaper notice was published in *The Signal* and *La Opinion* on December 8, 2015. Notices to property owners and tenants located within a 1,000-foot radius of the property boundaries, and to two local libraries, were mailed on December 1, 2015. Notices were verified to be posted on the subject property and were made available on the DRP's website on December 1, 2015. On December 7, 2015, a Notice of Completion and Notice of Availability (NOC-NOA) of a Draft EIR was posted at the Los Angeles County Clerk's office. The NOC-NOA was sent by mail or delivery service to required agencies, including the State Clearinghouse and other interested parties. The NOC-NOA was also posted on the Project site and on the DRP's website. The formal public review period for the Draft EIR was from December 8, 2015 to January 21, 2016. Comments on the Draft EIR were received during the comment period, and those comments are responded to in this Final EIR. The Final EIR, together with the Project, will be submitted to the County of Los Angeles Regional Planning Commission (the Commission) for review, and the Commission will consider approval of the following entitlement discretionary actions:

- Certification of an Environmental Impact Report;
- Vesting Tentative Tract Map for 121 total lots (102 single-family residential lots, two lots for water tanks/pump station, eight lots for open space/water quality basins, one lot for open space/fire access road, eight lots for open space/landscape/natural);
- Conditional Use Permit (“CUP”) for a density-controlled development and density transfer from Urban land use category in a hillside area, for development within a hillside management area exceeding the low density threshold, and for grading exceeding 100,000 cubic yards of soil materials; and
- Oak Tree Permit for the removal of one oak tree.

Prior to Project implementation, the following regulatory permits must be approved:

- Section 404 permit from the U.S. Army Corps of Engineers (USACE) for impacts to Waters of the U.S.;
- Section 1602 Streambed Alteration Agreement from the California Department of Fish and Wildlife (“CDFW”) for impacts to streams; and
- Section 401 Certification from the Los Angeles Regional Water Quality Control Board (LARWQCB) for impacts to surface water quality and Waters of the U.S.

1.2 CONTENT OF THE FINAL EIR

As discussed above, the primary intent of the Final EIR is to provide a forum to express and address comments pertaining to the analysis contained within the Draft EIR. Pursuant to Section 15088 of the *State CEQA Guidelines*, the County has reviewed and addressed all comments received on the Draft EIR by the comment period deadline. Included within the Final EIR are the written comments that were submitted during the public comment period as well as oral comments received at the public hearing.

In order to adequately address the comments provided by interested agencies and the public in an organized manner, this Final EIR includes the following sections and appendices:

Section 1.0: Introduction: This section provides a brief introduction to the Final EIR and its contents.

Section 2.0: Responses to Comments: This section provides a list of commenting agencies, organizations, and individuals. Responses to all comments on the Draft EIR are also included in this section. Some of the letters received also provide comments on the Project design (not the anticipated environmental impacts). These design-related comments are addressed separately as part of the discretionary approval process.

Section 3.0: Corrections and Additions: This section provides a list of corrections and additions to the Draft EIR. None of the changes substantially alter the conclusions presented in the Draft EIR.

Section 4.0: Mitigation Monitoring and Reporting Program: This section includes the MMRP prepared in compliance with the requirements of Section 21081.6 of the California Public Resources Code and Section 15091(d) and 15097 of the *State CEQA Guidelines*.

The Final EIR also includes the previously circulated Draft EIR, herein incorporated by reference.

1.3 REVIEW AND CERTIFICATION OF THE FINAL EIR

Consistent with CEQA (Public Resource Code Section 21092.5), responses to agency comments are being forwarded to each commenting agency 10 days prior to certification of the Final EIR. In addition, responses are also being distributed to all commenters who provided an address.

To ensure public access to the Final EIR, copies of the document are available for review on the DRP's website (listed under County Project No. 00-136-[5]).

Copies of the Final EIR will be available for public review Monday through Thursday, 7:30 AM to 5:30 PM at:

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

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2. RESPONSE TO COMMENTS

2. RESPONSES TO COMMENTS

A total of 11 comment letters were received on the Draft EIR. Four comment letters from State Agencies (State of California Governor's Office of Planning and Research [OPR], California Department of Transportation [Caltrans], Santa Monica Mountains Conservancy [SMMC], and the California Department of Fish and Wildlife [CDFW], which was received on February 5, 2016, past the formal public review period closing date of January 21, 2016), three comment letters from Local Agencies (County of Los Angeles Fire Department [LACFD], County Sanitation Districts of Los Angeles County [Sanitation], and County of Los Angeles Sheriff's Department [LASD]), and four comment letters from Organizations (Castaic Lake Water Agency [CLWA], Fernandeno Tataviam Band of Mission Indians Tribal Historic & Cultural Preservation, Santa Clarita Organization for Planning and the Environment [SCOPE], and the Sierra Club). In addition, oral comments (two commenters) were provided at the Department of Regional Planning (DRP) Hearing Examiner hearing held on January 11, 2016. Comments addressing environmental issues are thoroughly responded to. Comments that (1) do not address the adequacy of completeness of the Draft EIR; (2) do not raise environmental issues; or (3) do request the incorporation of additional information not relevant to environmental issues do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines.

Section 15088 of the State CEQA Guidelines, Evaluation of and Response to Comments, states:

- a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.
- b) The lead agency shall provide a written response to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report.
- c) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail, giving the reasons that specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.
- d) The response to comments may take the form of a revision to the draft EIR or may be a separate section in the final EIR. Where the response to comments make important changes in the information contained in the text of the draft EIR, the lead agency should either:
 1. Revise the text in the body of the EIR; or
 2. Include marginal notes showing that the information is revised in the responses to comments.

Information provided in this volume of the Final EIR clarifies, amplifies, or makes minor modifications to the Draft EIR. No significant changes have been made to the information contained in the Draft EIR as a result of

the responses to comments, and no significant new information has been added that would require recirculation of the document.

A set of corrections and additions to the EIR (Chapter 3, *Corrections and Additions to the Draft EIR*, of this Final EIR) has been prepared as a result of County review and comments received during the public review period. Therefore, this Response to Comments Chapter, along with these corrections and additions, are included as part of the Final EIR for consideration by the Regional Planning Commission (RPC) and/or Board of Supervisors (if appealed) prior to a decision to certify the Final EIR.

2.1 LIST OF PERSONS, ORGANIZATIONS, AND PUBLIC AGENCIES COMMENTING ON THE DEIR

The state agencies, organizations, and individuals that submitted comments regarding the Draft EIR through January 21, 2016, are listed below. A total of 11 comment letters were received. Four comment letters from State Agencies (State of California Governor's Office of Planning and Research [OPR], California Department of Transportation [Caltrans], Santa Monica Mountains Conservancy [SMMC], and the California Department of Fish and Wildlife [CDFW], the last of which was received on February 5, 2016--past the formal public review period closing date of January 21, 2016), three comment letters from Local Agencies (County of Los Angeles Fire Department [LACFD], County Sanitation Districts of Los Angeles County [Sanitation], and County of Los Angeles Sheriff's Department [LASD]), and four comment letters from Organizations (Castaic Lake Water Agency [CLWA], Fernandeno Tataviam Band of Mission Indians Tribal Historic & Cultural Preservation, Santa Clarita Organization for Planning and the Environment [SCOPE], and the Sierra Club). In addition, oral comments (two commenters) were provided at the Department of Regional Planning (DRP) Hearing Examiner hearing held on January 11, 2016. Each comment letter received and transcripts of the oral comments received are indexed with a letter below and is arranged by Agency and Organization, or by name in case of transcripts for oral comments.

Written Comment Letters Received Regarding the Draft EIR

State Agencies

A STATE OF CALIFORNIA GOVERNOR'S OFFICE OF PLANNING AND RESEARCH (OPR)

Scott Morgan, Director
1400 10th Street
P.O. Box 3044
Sacramento, CA 95812-3044
(January 21, 2016)

B CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS) DISTRICT 7 – OFFICE OF TRANSPORTATION PLANNING

Dianna Watson, Branch Chief
100 S. Main Street
Los Angeles, CA 90012
(January 14, 2016)

C SANTA MONICA MOUNTAINS CONSERVANCY (SMMC)

Irma Munoz, Chairperson
Ramirez Canyon Park
5750 Ramirez Canyon Road
Malibu, CA 90265
(January 11, 2016)

Local Agencies**D COUNTY OF LOS ANGELES FIRE DEPARTMENT (LACFD)**

Kevin T. Johnson, Acting Chief, Forestry Division Prevention Services Bureau
1320 North Eastern Avenue
Los Angeles, CA 90063
(January 11, 2016)

E COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

Adriana Raza, Customer Service Specialist, Facilities Planning Department
1955 Workman Mill Road
Whittier, CA 90601
(December 30, 2015)

F COUNTY OF LOS ANGELES SHERIFF'S DEPARTMENT (LASD)

Jim McDonnell, Sheriff, and Tracey Jue, Director, Facilities Planning Bureau
4700 Ramona Boulevard
Monterey Park, CA 91754
(February 2, 2016)

Organizations**G CASTAIC LAKE WATER AGENCY (CLWA)**

Matthew G. Stone, General Manager
27234 Bouquet Canyon Road
Santa Clarita, CA 91350
(January 21, 2016)

H FERNANDENO TATAVIAM BAND OF MISSION INDIANS TRIBAL HISTORIC & CULTURAL PRESERVATION

Caitlin Gulley, Director, Tribal Historic and Cultural Preservation Department
1019 Second Street
San Fernando, CA 91340
(December 15, 2015)

I SANTA CLARITA ORGANIZATION FOR PLANNING AND THE ENVIRONMENT (SCOPE)

Lynne Plambeck, President
P.O. Box 1182

Santa Clarita, CA 91386
(January 20, 2016)

J SIERRA CLUB

David Morrow, M.D., Chairman, Santa Clarita Group
26920 Monterey Avenue
Santa Clarita, CA 91355
(January 20, 2016)

Oral Comments Received Regarding the Draft EIR

Individuals

K DEPARTMENT OF REGIONAL PLANNING HEARING EXAMINER HEARING (JANUARY 11, 2016)

Public Testimony
Martin Keegan
Manuel Santana
Pico Canyon Elementary School, Multipurpose Room
25255 Pico Canyon Road
Stevenson Ranch, CA 91381

Late Written Comment Letter Received Regarding the Draft EIR

State Agencies

L STATE OF CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE (CDFW)

Betty J. Courtney, Environmental Program Manager I
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(February 5, 2016)

2.2 FORMAT OF RESPONSES TO COMMENTS

Courtesy statements, introductions, closings, and individual comments within the body of each letter have been identified and numbered. A copy of each comment letter and the County's responses are included in this section. Brackets delineating the individual comments and an alphanumeric identifier have been added to the right margin of the letter. Responses to each comment identified are included on the page(s) following each comment letter. Responses to comments were sent to the agencies that provided comments at least 10 days prior to the Planning Commission and/or Board of Supervisors (if appealed) consideration of certification of the Final EIR (CEQA Guidelines Section 15088(b)).

In the process of responding to the comments, there were minor revisions to the EIR. None of the comments, responses, or revisions constitutes "significant new information" (State CEQA Guidelines Section 15088.5)

that would require recirculation of the EIR. The changes to the Draft EIR included in these EIR modifications do not constitute “significant” new information because:

- No new significant environmental impact would result from the project or from a new mitigation measure;
- There is no substantial increase in the severity of an environmental impact that would result unless mitigation measures are adopted that reduce the identified significant impacts to a level of insignificance;
- No feasible project alternative or mitigation measure considerably different from others previously analyzed has been proposed or identified that would clearly lessen the significant environmental impacts of the project; and
- The Draft EIR is not fundamentally or basically inadequate or conclusory in nature such that meaningful public review and comment were precluded.

Therefore, recirculation of the Draft EIR is not required because the new information added to the EIR through these modifications clarifies or amplifies information already provided or makes insignificant modifications to the already adequate Draft EIR.

Letter A

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT



EDMUND G. BROWN JR.
GOVERNOR



KEN ALEX
DIRECTOR

January 21, 2016

Tyler Montgomery
Los Angeles County
320 West Temple Street
Los Angeles, CA 90012

Subject: Aidlin Hills Project (County Project No. 00-136, VTTM 52796, CUP 00-136, OTP 00-136
SCH#: 2014091027

Dear Tyler Montgomery:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 20, 2016, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

RECEIVED
2016 JAN 25 PM 2:18
DEPT OF REGIONAL PLANNING

Enclosures
cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2014091027
Project Title Aidlin Hills Project (County Project No. 00-136, VTTM 52796, CUP 00-136, OTP 00-136)
Lead Agency Los Angeles County

Type EIR Draft EIR

Description The Project applicant proposes to develop 102 single-family dwellings and associated supporting infrastructure including load roadways, water tanks and a pump station, water quality treatment basins, and a fire access road. The proposed residential lots would occupy 20.8 acres. The remaining improved areas of the Project site would include 3.9 acres for water tanks/pump stations, 1.5 acres of water quality basins, a 1.4-acre fire access road, and 9.6 acres of public streets. The project applicant also proposes the preservation of 193.3 acres of undeveloped, natural area within the southern and western portions of the Project site. Project would require about 1,300,000 cubic yards of grading to be balanced on-site. One oak tree would be removed.

Lead Agency Contact

Name Tyler Montgomery
Agency Los Angeles County
Phone 213 974 6433 **Fax**
email
Address 320 West Temple Street
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City
Region
Lat / Long 34° 22' 42" N / 118° 35' 41" W
Cross Streets Pico Canyon Road
Parcel No. 2826020020-024, 2826020030-033, 2826097003
Township 3N **Range** 16W **Section** 6 **Base** SBB&M

Proximity to:

Highways I-5
Airports No
Railways No
Waterways Pico Creek and Wickman Canyon
Schools Pico Cyn ES, Stevenson Ranch ES
Land Use Vacant / 1-Low Density Residential and R-Non-Urban Uses, A-2-2 (Heavy Agricultural Zone, two-acre minimum lot size).

Project Issues Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Public Services; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Cal Fire; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services, California; California Highway Patrol; Caltrans, District 7; Air Resources Board; State Water Resources Control Board, Division of Drinking Water; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Santa Monica Mountains Conservancy

Date Received 12/07/2015 **Start of Review** 12/07/2015 **End of Review** 01/20/2016

2.3 RESPONSE TO LETTER A

STATE OF CALIFORNIA GOVERNOR'S OFFICE OF PLANNING AND RESEARCH (OPR)

Scott Morgan, Director

1400 10th Street

P.O. Box 3044

Sacramento, CA 95812-3044

(January 21, 2016)

RESPONSE TO COMMENT A-1.

This letter from the Governor's Office of Planning and Research (OPR) State Clearinghouse and Planning Unit (State Clearinghouse) states that the County has complied with the State Clearinghouse review requirements for draft environmental documents. The comment also notes that the State Clearinghouse distributed the Draft EIR to state agencies for review and received comments from one of the state agencies: the California Department of Transportation (Caltrans), Letter B.

DEPARTMENT OF TRANSPORTATION
 DISTRICT 7—OFFICE OF TRANSPORTATION PLANNING
 100 S. MAIN STREET, MS 16
 LOS ANGELES, CA 90012
 PHONE (213) 897-9140
 FAX (213) 897-1337
 www.dot.ca.gov

Letter B



Serious drought.
 Help save water!

RECEIVED

JAN 14 2016

STATE CLEARING HOUSE

January 14, 2016

Mr. Tyler Montgomery
 Los Angeles County
 320 West Temple Street
 Los Angeles, CA 90012

RE: Aidlin Hills Project
 Vic. LA-05/ PM R50.323-R51.451
 SCH # 2014091027
 IGR/CEQA No. 151217AL-DEIR

Dear Mr. Montgomery:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project proposes to develop 102 single-family dwellings and associated supporting infrastructure including load roadways, water tanks and a pump station, water quality treatment basins, and a fire access road.

The project will generate a 971 daily trips and 76/102 AM/PM peak hour trips. There are 18 related projects in the project vicinity. When all projects are developed, many of the trips will utilize the State facilities. As a reminder, the decision makers should be aware of this issue and be prepared to mitigate cumulative traffic impacts in the future.

The traffic volumes shown on Figure 2-4 (AM Peak Hour Turning Movement Volume Existing Conditions), Figure 4-5 (AM Peak Hour Turning Volumes Cumulative Conditions without Project (2034)), and Figure 4-8 (AM Peak Hour Turning Movement Volumes Cumulative Conditions with Project (2034)), indicates that there is a significant drop in volumes for some of the traffic movements at intersections #14, #15, #16, and #17. An explanation for the drop in volumes should be provided. When analyzing the State facilities, queuing analysis of the off-ramp should be conducted using the Highway Capacity Manual Methodology (HCM).

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without a storm water management plan.

Mr. Tyler Montgomery
January 14, 2016
Page 2

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

4

Caltrans would like to work with the City in an effort to evaluate traffic impacts, identify potential improvements, and establish a funding mechanism that helps mitigate cumulative transportation impacts in the project vicinity.

5

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to IGR/CEQA No. 151217AL-DEIR.

Sincerely,



DIANNA WATSON
Branch Chief
Community Planning & LD / IGR Review

cc: Scott Morgan, State Clearinghouse

2.4 RESPONSE TO LETTER B

CALIFORNIA DEPARTMENT OF TRANSPORTATION (CALTRANS)

DISTRICT 7 – OFFICE OF TRANSPORTATION PLANNING

Dianna Watson, Branch Chief

100 S. Main Street

Los Angeles, CA 90012

(January 14, 2016)

RESPONSE TO COMMENT B-1.

The commenter acknowledges receipt and review of the Draft EIR, and provides a brief summary of Project-related improvements. The commenter provides a reminder that when all 18 related projects are developed, many of the trips would utilize State facilities of which decision makers should be aware and be prepared to mitigate cumulative traffic impacts in the future. This comment does not raise any specific environmental concerns or issues regarding the Draft EIR. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT B-2.

The commenter synthesizes the four State highway-affiliated study intersections (numbers 14, 15, 16, and 17 associated with Interstate Highway 5) and notes that there is a significant drop in volumes for some of the traffic movements at these intersections. In addition, the commenter recommends using the Highway Capacity Manual Methodology (HCM) for conducting a queuing analysis of the highway off-ramps.

The traffic volumes between intersections #14 and #15 (McBean interchange) are balanced and do not indicate a significant drop in volumes at some movements, as stated in the comment (refer to Figures 2-4, 4-5, and 4-8). For example, Figure 2-4 shows that in the eastbound direction, the volume of traffic that departs from intersection #14 is 820 vehicles per hour (vph), and the volume of traffic that enters intersection #15 is 810 vph, a difference of 10 vph. In the opposite (westbound) direction, the volume of traffic that departs from intersection #15 is 990 vph, and the volume of traffic that enters intersection #14 is 970 vph, a difference of 20 vph. Figures 4-5 and 4-8 (cumulative conditions) depict volume differences between the intersections amounting to 60 vph in the eastbound direction and 30 vph in the westbound direction. The small difference between intersections can be attributed to the traffic counts for these intersections, which were collected on different days, and these minor differences do not affect the findings of the analysis.

Between intersections #16 and #17 (Pico/Lyons interchange), there are two additional intersections located between the ramps (Chiquiella Way at Pico Canyon Road and the I-5 Southbound Direct On-Ramp from eastbound Pico Canyon Road). There are also multiple driveways for retail commercial centers between intersection #16 and Chiquiella Way. These two additional intersections and driveways contribute to both the addition and removal of traffic from Pico Canyon Road. As such, intersections #16 and #17 should not be expected to indicate balanced volumes.

An HCM analysis of the off-ramp intersections was prepared for the EIR using the Synchro macroscopic analysis software. A summary of off-ramp queue lengths as calculated by that analysis is provided in the comparison table below. As shown, all off-ramp lanes are forecast to exhibit peak hour queues of approximately 400 vehicles or less, which would not affect the freeway mainline. The comparison table also

indicates the Project would have a negligible effect on queue lengths, as most are shown to not be affected by Project traffic, and the largest change is an increase of less than 10 feet.

Off-Ramp Queue Length Summary

Location	95 th Percentile Queue Lengths (Peak Hour)			
	AM w/out Proj	AM plus Proj	PM w/out Proj	PM plus Proj
Existing Conditions				
I-5 SB Off at McBean	102 feet	102 feet	140 feet	149 feet
I-5 NB Off at McBean	101 feet	102 feet	163 feet	164 feet
I-5 SB Off at Pico/Lyons	232 feet	232 feet	331 feet	331 feet
I-5 NB Off at Pico/Lyons	77 feet	77 feet	400 feet	406 feet
2034 Conditions				
I-5 SB Off at McBean	222 ¹ feet	225 ¹ feet	218 feet	218 feet
I-5 NB Off at McBean	107 feet	108 feet	215 feet	215 feet
I-5 SB Off at Pico/Lyons	217 ¹ feet	217 ¹ feet	365 feet	365 feet
I-5 NB Off at Pico/Lyons	34 feet	34 feet	247 feet	252 feet
195 th percentile volume exceeds capacity, 50 th percentile queue shown				

RESPONSE TO COMMENT B-3.

The commenter recommends that local approved projects be designed to discharge clean run-off water and that discharge of storm water run-off is not permitted onto State Highway facilities without a storm water management plan. As discussed on pages 4.8-23 and 4.8-24, in Section 4.8, *Hydrology and Water Quality*, of the Draft EIR, the Project would comply with the MS4/NPDES requirements, and only clean discharge would leave the site. Further, discharge of stormwater onto State Highway facilities is not proposed with this Project. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT B-4.

The commenter reminds the lead agency that transportation of heavy construction equipment and/or materials requiring the use of oversized-transport vehicles on State highways would require a transportation permit from Caltrans. The commenter also recommends that large-size truck trips be limited to off-peak commute periods. Peak hours are defined in the approved traffic impact analysis as the hours during the AM peak period (typically 7 AM - 9 AM) or the PM peak period (typically 3 PM - 6 PM) in which the greatest number of vehicle trips are generated by a given land use or are traveling on a given roadway.¹ Mitigation Measure 4.12-1 requires the preparation of a Traffic Control Plan that would be implemented during Project construction. This Traffic Control Plan would include provisions for the construction

¹ Stantec Consulting Services Inc. 2014. Aidlin Hills VTMM 52796 Traffic Impact Analysis. November 24, 2014.

contractor to transport large-size trucks during off-peak commute periods. In addition, State law requires that the transportation of oversized-vehicles on State highways must first obtain a transportation permit from Caltrans, and the Project construction contractor would comply with such State laws. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT B-5.

The commenter states that Caltrans would like to work with the County in an effort to evaluate traffic impacts, identify potential improvements, and establish a funding mechanism that helps mitigate cumulative transportation impacts in the Project vicinity. This comment will be provided to the County decision-makers for consideration but does not raise any specific environmental concerns or issues regarding the Draft EIR. As such, no further response in this regard is warranted.

SANTA MONICA MOUNTAINS CONSERVANCY

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January 11, 2016

Tyler Montgomery
Los Angeles County
320 West Temple Street
Los Angeles, California 90012

Draft Environmental Impact Report Comments
Aidlin Hills Project PN 00-136
SCH No. 2014091027

Dear Mr. Montgomery:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments and recommendations on the above-referenced Draft Environmental Impact Report (DEIR) that abuts the Conservancy’s Pico Canyon Park, a component of the Santa Clarita Woodlands. The proposed project with 3,200,000 cubic yards of grading, 102 houses, two large water tanks, and an intrusive elevated secondary access road would represent a major intrusion into the Santa Susana Mountains core habitat area.

1

The elimination of 53 acres of core Santa Susana Mountains habitat, permanent annual stripping of 13 acres of habitat for fuel modification, and all of the indirect impacts--such as lighting--of a 102 home subdivision comprises a significant biological impact on the ecological sustainability of the lower Pico Canyon watershed.

2

Much of the 2,300,000 CY of grading--a 1,500-foot-long section of development-- would be starkly visible from Pico Canyon Road. That viewshed would be further marred by a 1,500-foot-long, 200-foot-wide fuel modification zone below that long row of ridgeline houses. The combined development visibility, including lighting, and the fuel modification is a potentially significant visual impact from Pico Canyon Road.

3

As proposed, the project would adversely affect an approximately 4,000-foot-long section of viewshed along a scenic roadway. The location of 102 homes and streets with their night lighting impacts on the edge of the Santa Susana Mountains ecosystem in full view of both Pico Canyon Road and all associated public trails and sidewalks would result in unavoidable significant adverse visual impacts. The proposed landscaping along the front of the development cannot guarantee the blocking of views over the life of the project. The

beautiful rural feel of the site that leads to the entrance of Mentryville Park, would be substantially degraded. The visual character and quality of the site and surroundings would be substantially degraded. That viewshed degradation is avoidable with moderate project modifications.

3
(cont.)

These significant visual and biological impacts can easily be avoided by reducing the project footprint at higher elevations. It is good that approximately 70 percent of the site would not suffer from direct project impacts. However, the proposed area to be impacted has an average slope area that exceeds 40 percent and approximately 80 percent of the proposed development area has slopes in excess of 25 percent. The project itself does not meet its DEIR objective of placing development in flatter terrain. The mass graded project (3.2 million cubic yards of earth) does not fit the terrain or the natural landscape setting. Each house would require 25,000 cubic yards of grading.

4

The impacts (to the remaining 30 percent of the site) are not miraculously dissolved because the applicant proposes not to develop the undevelopable other 70 percent of the property.

All of the biological mitigation measures offer no permanent or adequately defined mitigation value. The biological mitigation measures only address giving animals in the development footprint some warning before their habitat is destroyed, or they represent deferred mitigation with undefined mitigation sites and performance criteria. The DEIR biological mitigation measures are inadequate to compensate for the loss of 66 acres of habitat in the Santa Clarita Woodlands area. The protection of the open space is valuable but, it does not offset the direct permanent impacts to at least 66 acres of habitat.

5

In order for the open space component of the project and each of its DEIR alternatives to provide the DEIR represented habitat values, the DEIR must provide both permanent third party land protection mechanisms and adequate funding to manage the open space for intrusions, trash, and other adverse occurrences.

6

The DEIR objective to provide added fire flow is noble, but the DEIR provides no evidence that the requested amount is necessary. What evidence is provided that the adjacent development needs additional fire flow to warrant significant impacts? It appears that this project objective is designed to deflect objection to the project more than to supply defined needs.

7

The design of the One Valley One Vision Alternative is physically infeasible because of topographic and drainage constraints. For this reason alone the alternatives analysis is flawed and deficient.

8

As addressed in the DEIR, the One Valley One Vision Density Control Alternative would greatly reduce many of the significant project impacts produced by the proposed project. Those reductions would take the level of impact below the level of significant.

9

The Reduced Density Alternative avoids all substantial impacts and should be the project approved by the County. It is the only alternative without adequate impact reduction and public benefits.

10

The greenhouse gas emission baseline must not be adequate in the DEIR if 2,300,000 cubic yards of grading do not result in a significant green house gas production impact.

11

The DEIR is deficient because the project and alternatives do not include a public trail from Pico Canyon Road up Wickham Canyon to the proposed public open space lot. The DEIR is deficient because the wildlife movement effects on the proposed culvert size for the emergency access road to Verahda Court is not addressed. The DEIR is deficient because wildlife impacts from Verahada Court street lighting is not addressed.

12

The DEIR is deficient because it does not address the full fee simple dedication of the open space to a public park or open space agency as a prerequisite of tract map recordation. Such timely transfer is essential to preserve the ecological values of the open space described in the DEIR.

13

The DEIR is deficient because it does not address how irrigated perimeter slopes will adversely impact south coast horned lizards via sustaining Argentine ant populations.

14

The DEIR is deficient because it does not address in detail what County Flood Control District clean out requirements will be placed on the proposed storm water infiltration basins in regards to perpetual loss of wetland vegetation.

15

Please contact Paul Edelman, Deputy Director of Natural Resources and Planning, at 310-589-3200, ext. 128 with any questions and future correspondence.

Sincerely,



IRMA MUNOZ
Chairperson

2.5 RESPONSE TO LETTER C

SANTA MONICA MOUNTAINS CONSERVANCY (SMMC)

Irma Munoz, Chairperson

Ramirez Canyon Park
5750 Ramirez Canyon Road
Malibu, CA 90265
(January 11, 2016)

RESPONSE TO COMMENT C-1.

The commenter acknowledges receipt and review of the Draft EIR, and provides a brief summary of Project-related improvements. This comment does not raise any specific environmental concerns or issues regarding the Draft EIR. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT C-2.

The commenter alleges that the Project development footprint of 53 acres, with an additional 13 acres of fuel modification, is a significant elimination of core Santa Susana Mountains habitat and would impair the ecological function of the lower Pico Canyon watershed. The comment does not define the lower Pico Canyon watershed; for the purpose of this response, it is assumed that the upper Pico Canyon watershed consists of Pico Canyon upstream of the Project site within the Santa Clarita Woodlands Park area, which would not be impacted by the proposed Project, and that the lower Pico Canyon watershed encompasses the Project site and Pico Canyon downstream to The Old Road. The lower Pico Canyon watershed is primarily a channelized flood control facility beginning in the northeast corner of the Project site and continuing downstream to the Old Road. There is a substantial retention basin at the northeast corner of Pico Canyon Road and Stevenson Ranch Parkway that provides ecological functions, and there is a short stretch (approximately 900 feet in length) of willow riparian woodland at the northwest corner of the same intersection, which possesses quality habitat. This willow riparian woodland is approximately one-quarter mile downstream from the Project development and would have no direct impact from the Project. Otherwise, the lower Pico Canyon watershed consists chiefly of a concrete-lined channel, including the catch basin located at the northeast portion of the Project site. Based on the December 2015 Regulatory Permit Application submitted to the US Army Corps of Engineers (USACE) and containing a formal jurisdictional delineation for the Project,² permanent impacts to Pico Canyon Waters of the U.S. are 0.11 acre (457 linear feet) with 0.04 acre (312 linear feet) of temporary impact. The existing catch basin would be relocated approximately 500 feet upstream from the current location, and there would be no impacts to the downstream willow riparian woodland or the downstream retention basin. Therefore, Project impacts to Pico Canyon are concluded to be less than significant with the implementation of Project mitigation measures and compliance with the USACE 404 and the California Department of Fish and Wildlife 1603 regulatory permits. The ecological sustainability of Pico Canyon would not be further compromised by the proposed Project.

Because the Project site is situated at the edge of urbanized Stevenson Ranch to the east and northeast, and the Santa Susana Mountains wildlife core habitat is located to the south and west, the Project site is not considered to be core habitat. The Project site is a peripheral component of the overall open space core

² *Nationwide Permit Pre-Construction Notification Form, File No. SPL-2016-00022. Submitted December 14, 2015.*

habitat of the Santa Susana Mountains, and the Project site contributes to the core habitat's continued ecological functionality. The native vegetation communities on the Project site support a variety of wildlife whose home ranges include the open space areas to the south and west of the site. Project implementation would impact approximately 66 acres, the majority (about 38 acres) of which is either annual grassland or bush mallow scrub, as identified in **Table 4.3-2, Impacts to Plant Communities in the Draft EIR**. Project impacts to plant communities and the sensitive communities of thick-leaved yerba santa scrub (0.6 acre), giant wild rye grassland (0.7 acre), California bush sunflower scrub (1.3 acres), toyon chaparral (6.0 acres), and foothill ash scrub (1.8 acres) would be less than significant with the implementation of Mitigation Measure 4.3-3 to enhance or restore sensitive communities. The Project design incorporates undeveloped open space along the west and the south--the closest areas to existing open space--which would buffer the core habitat of the Santa Susana Mountains from the proposed residential development.

RESPONSE TO COMMENT C-3.

The commenter is of the opinion that the proposed Project design and landform alteration would result in a potentially significant visual impact from Pico Canyon Road. The commenter contends that Pico Canyon Road is a scenic roadway and that the proposed Project would adversely affect the viewshed along this roadway, as landscaping would not block views of the residential development. Additionally, the commenter asserts that the rural setting entrance to Mentryville Park to the west would be substantially degraded.

The Draft EIR analysis of view impacts is based on the potential for the Project to result in changes to existing views within and near the Project site as perceived by the public (e.g., motorists and pedestrians on the surrounding roadways and pedestrians on Pico Canyon Road and Pico Canyon Trail). The Draft EIR acknowledges that a portion of the proposed residences would be visible along Pico Canyon Road. However, Pico Canyon Road is not designated by any State or local agency as a scenic roadway. As stated in **Section 4.1, Aesthetics** of the DEIR, there are no designated scenic highways with views of the Project site, and existing views are not otherwise called out as scenic or designated for protection by state or local agencies. The Project site is located approximately 1.6 miles west of I-5. According to Figure 9.7, Scenic Highways, of the Los Angeles County General Plan 2035 and the Scenic Highways Plan map in the 1990 Santa Clarita Valley Area Plan, a portion of I-5 southeast of the Project site is designated as an eligible scenic highway. Due to the distance and intervening topography, the Project site is not visible from the scenic highway segment. Thus, no views of the site are available from a scenic highway.

The Draft EIR analysis of lighting focuses on potential adverse light spillover effects on sensitive receptors (i.e., the single-family residential community, Southern Oaks, located directly east of the Project site) due to the use of artificial light during evening and nighttime hours. Artificial light may be generated from point sources as well as from indirect sources of reflected light. Artificial light from the Project would not be visible to sensitive receptors, as the most dominant source of nighttime lighting would be concentrated along streets in the interior of the development area, rather than along the edges of the site. The highest street and building pad elevation would be about 100 feet lower than the western ridgeline separating the Project site development area from the open space areas to the west, which is managed by the Mountains Recreation and Conservation Authority. Therefore, the Project would not substantially alter the lighting character in surrounding communities and open space areas because of intervening topography and mandatory compliance with the County's Rural Outdoor Lighting standards. As such, impacts related to lighting would be less than significant.

Of the 230 acres encompassing the entire Project site, the Project would preserve approximately 165 acres (71 percent) as undeveloped, natural areas within the southern and western portions of the Project site. The majority of the Project developed area would be west of Wickham Canyon, at lower elevations than the two hillside areas separating the Project site from Mentryville, minimizing view impacts from the public areas west of the Project site. Views of the proposed Project along Pico Canyon Road and from Pico Canyon Trail would be similar to those of the existing Southern Oaks community. The prominent ridgelines between Mentryville and developed areas would be left in their natural conditions. The Project applicant proposes to widen for a distance of less than 1,000 feet the segment of Pico Canyon Road that generally traverses the northern boundary of the Project site, in accordance with the approved alignment of the road. While the Project would extend the Stevenson Ranch suburban development west of the Southern Oaks community, the rural ambience along Pico Canyon Road leading to Mentryville would remain similar to current ambience. This is due to the undeveloped north side of the two-lane roadway, the undeveloped section of Pico Canyon paralleling the south side of the roadway, which creates a buffer of between 300 and 750 feet between the Project site and the roadway, and the fact that the Mentryville access road continues through undeveloped terrain for a half mile beyond the end of the public road. The proposed improvements are consistent with the County's designation of the roadway as a major arterial. Lastly, due to distance and topography, views of the Project site area not available from Mentryville Park, nor are these historical resources visible from the Project site.

RESPONSE TO COMMENT C-4.

The commenter states that the significant biological and visual resource impacts may be mitigated by avoiding the hillside topography and claims the current Project design does not meet the Project objective to place development on the site's most level terrain.

As concluded in **Section 4.1 Aesthetics** (Page 4.1-19), no potentially significant aesthetic impacts were identified and **Section 4.3, Biological Resources**, concludes that with incorporation of Project design features and the implementation of the Draft EIR mitigation measures, impacts associated with biological resources would be reduced to a less-than-significant level (Page 4.3-54). There are no unmitigated significant impacts to biological or visual resources.

In regard to hillside management, the proposed Project design would constrain density of development and result in the preservation of approximately 165 acres (71 percent of the site) as permanent natural open space. Grading would be engineered in accordance with the Los Angeles County Grading Manual, and existing drainage channels within Wickham and Pico Canyons would be primarily ungraded. Grading of the site would include hillside slopes to remediate existing geologic conditions and to create stable building pads and internal roadways. Manufactured slopes would have an average grade of 2 horizontal to 1 vertical, or 50 percent. The grading limits would extend off-site to the north and east to permit slope rounding and adequate transitions to natural terrain, encompassing an additional seven to eight acres off-site. The Project site contains 32.4 acres of slopes of 0-24.99 percent, 55.2 acres with slopes of 25-49.99 percent and 133.9 acres with slopes of 50 percent or greater. The flattest terrain is within the floodplain or floodway of Pico and Wickham Canyons, but hillside management criteria require that these drainages remain in their natural state to the greatest extent possible. Consequently, the Project grading design avoids the floodplains while incorporating the flatter areas of the Project site outside of the drainage areas. The October 15, 2015 Subdivision Committee Report found that the Project was consistent with the Hillside Management criteria.

RESPONSE TO COMMENT C-5.

The commenter claims that none of the proposed biological mitigation measures offer permanent or adequate mitigation value because they either defer mitigation or simply warn animals of destruction of their habitat. The commenter additionally claims that the preservation of 165 acres of open space is inadequate compensation for the loss of 66 acres of habitat.

The County does not agree with these comments. The 165 acres of natural open space (Mitigation Measure 4.3-2) would be contiguous with the Santa Clarita Woodlands open space to the west as well as the open space to the southeast of the Project site. In addition, portions of the habitat within the 165 acres are suitable for a variety of special-status wildlife species, including western spadefoot (*Spea hammondi*), silvery legless lizard (*Anniella pulchra pulchra*), coastal whiptail (*Aspidoscelis tigris stejnegeri*), coast horned lizard (*Phrynosoma blainvillii*), rosy boa (*Charina trivirgata*), golden eagle (*Aquila chrysaetos*), Cooper's hawk (*Accipiter cooperii*) (foraging), Swainson's hawk (*Buteo swainsoni*) (foraging), white-tailed kite (*Elanus leucurus*) (foraging), prairie falcon (*Falco mexicanus*), turkey vulture (*Cathartes aura*), lesser nighthawk (*Chordeiles acutipennis*), greater roadrunner (*Geococcyx californianus*), hairy woodpecker (*Picoides villosus*), mountain bluebird (*Sialia currucoides*) (foraging), loggerhead shrike (*Lanius ludovicianus*) (foraging), California horned lark (*Eremophila alpestris actia*), coastal California gnatcatcher (*Polioptila californica californica*), western meadowlark (*Sturnella neglecta*), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), grasshopper sparrow (*Ammodramus savannarum*), Bell's sage sparrow (*Artemisospiza belli belli*), spotted bat (*Euderma maculatum*), pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), western mastiff bat (*Eumops perotis californicus*), hoary bat (*Lasiurus cinereus*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), southern grasshopper mouse (*Onychomys torridus ramona*) and San Diego desert woodrat (*Neotoma lepida intermedia*), although these species have not been recorded from the Project site.

Mitigation Measure 4.3-1 provides for the reproduction and on-site establishment of the slender and Plummer's mariposa lily (*Calochortus clavatus* var. *gracilis* and *C. plummerae*). Mitigation Measures 4.3-3 provides for the rescue and on-site relocation of western spadefoot, should the species be discovered on the Project site. Mitigation Measure 4.3-4 provides that rosy boa, coast horned lizard, silvery legless lizard, and coastal whiptail, should they occur on the Project site, be collected and relocated to suitable habitat within nearby dedicated open space. Mitigation Measure 4.3-5 does provide advance warning for San Diego black-tailed jackrabbit to allow non-breeding individuals the opportunity to avoid the active construction area; breeding rabbits would be avoided until offspring have been reared allowed to leave the nest. Mitigation Measure 4.3-6 provides that nesting San Diego desert woodrat, should the species be found on the Project site, be avoided until the young have left the nest. If this is not possible, Mitigation Measure 4.3-7 provides that they be allowed the opportunity to reach a safe location outside of the grading envelope, with any remaining occupied nest to be transferred to suitable habitat within nearby open space. Mitigation Measure 4.3-8 provides for the safety of a variety of wildlife species including bats, should they occur on the Project site, by allowing their escape into suitable habitat within nearby dedicated open space and protecting active nesting areas during the nesting season. Mitigation Measure 4.3-9 requires the proponent to restore or enhance sensitive plant communities within previously disturbed habitat areas, either on-site or off-site, under a specific suite of requirements. Mitigation measure 4.3-10 provides for the establishment of regulatory jurisdictional resources to offset the loss of such resources. Mitigation Measure 4.3-11 requires the Project proponent to comply with the Migratory Bird Treaty Act by avoiding direct impacts to avian nest locations until such time as the nests are vacated. Lastly, Mitigation Measure 4.3-12 mandates that the Project proponent plant two replacement oak trees for the removed oak tree. The Draft EIR concludes that,

with incorporation of Project design features and the implementation of the above mitigation measures, impacts associated with biological resources would be reduced to a less-than-significant level.

RESPONSE TO COMMENT C-6.

The commenter suggests that the proposed 165 acres of open space would only represent habitat value if a third party were given permanent management responsibilities over the area, with the addition of funding to manage the open space.

The proposed open space area would be covered by a conservation easement for the preservation of the biological resources. The Project proponent is amenable to conveying the open space to an acceptable land steward, which would manage the area for the perpetuation of the biological resources. The opportunity for habitat enhancement within open space area would be retained by the Project proponent in order to implement some of the required mitigation.

The suggestion of third party open space management will be provided to the decision makers for consideration. The comment does not address a specific topic within the Draft EIR, and no further response is necessary.

RESPONSE TO COMMENT C-7.

The commenter suggests that the Draft EIR includes an objective to provide added fire flow, and is used to deflect objection of the Project more than to supply defined needs. The commenter is requesting evidence that the adjacent development needs additional fire flow to warrant significant impacts. This comment does not specify what impacts are considered significant. The Draft EIR concludes that there are no unmitigated significant impacts; consequently it is not possible to determine to what potential significant impact this comment refers.

Section 2.0, *Project Description*, of the Draft EIR, Objective 12, is to incorporate multiple fire protection measures to safeguard the Project and the existing adjacent residential community from wildfire hazards. As discussed on pages 4.7-29 through 4.7-33, in Section 4.7, *Hazards and Hazardous Materials*, of the Draft EIR, the fire protection measures proposed by the Project include a fuel modification plan which would incorporate a landscape plan that utilizes a plant palette consisting of fire retardant plants and native and appropriate non-native drought tolerant species in accordance with the LACFD guidelines; an emergency vehicle access road to the east, connecting with Verandah Court, and serving as a second point of emergency access and evacuation; two 250,000-gallon water storage tanks, one booster station, two pressure regulating stations, and a 12-inch pipeline within Pico Canyon with a secondary point of connection at Verandah Court; and overall compliance with the Los Angeles County Building and Fire Code along with all applicable department regulations and standards. Mitigation Measure 4.7-3 requires the Project proponent to fund any necessary upgrades to the surrounding water infrastructure to meet fire flow requirements, with the Valencia Water District designing and constructing the necessary upgrades at the Project proponent's expense. As discussed on page 4.7.20, in Section 4.7, *Hazards and Hazardous Materials*, of the Draft EIR, the Project site is located within Fire Zone 4, which is a Very High Fire Hazard Severity Zone (VHFHSZ). The regional natural vegetation in this area is highly prone to wildfires. Historically, large fires tend to burn in both Moderate Fire Hazard Zones and VHFHSZ every 20 to 25 years. In 2010, the Project site and surrounding areas burned during a wildfire. The Draft EIR does not state the adjacent development requires additional fire flow. However, the location of the proposed water tanks, which would be operated by the

Valencia Water Company, are to be located at an elevation of 1,800 feet, an elevation that is 1,000 feet higher than the closest existing water tank about 0.5 mile southeast of the Southern Oaks community. With the water tanks at a higher elevation, a higher fire flow is achieved meeting the Fire Department's required water pressure under a gravity flow system. With the existing water tank to the southeast of the Southern Oaks community at an elevation of 1,700 feet and the highest residential location with this community being 1,585 at the west end of Verandah Court and a distance of 1.1 mile, the proposed new water tanks at an elevation of 1,800 feet and only about 0.5 mile away would provide more reliable and adequate fire flow than currently available. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT C-8.

The commenter suggests the alternative analysis within the Draft EIR is flawed and deficient, as the "One Valley, One Vision" Alternative is physically infeasible due to topographic and drainage constraints. Section 5.0, *Alternatives*, of the Draft EIR, analyzes the "One Valley, One Vision" Alternative and the "One Valley, One Vision" Density-Controlled Alternative.

As discussed in Section 5.0, *Alternatives*, page 5-2, the "One Valley, One Vision" Alternative would be consistent with the 2012 "One Valley, One Vision" Plan with land use categories of RL 5 (Rural Land 5; 60 acres) and RL 20 (Rural Land 20; 170 acres). This Alternative could create up to 12 five-acre and eight 20-acre parcels with each lot's development potential up to 3.5 acres. The development potential area would result from the requirements for compliance with the Hillside Management regulations for safe manufactured slopes not exceeding 2:1 (50%). The resulting 20-parcel subdivision would have a development footprint, inclusive of fuel modification, of approximately 70 acres, which would not necessarily be clustered. No provision for water storage tanks would be included in this Alternative, and a secondary emergency access would not be needed or proposed. It is assumed that residential parcels may include individual equestrian facilities, which would be developed within the respective 5-acre and 20-acre parcels. Although no specific design has been developed, this alternative could be designed with building pads sited along ridgelines or other low relief topographic areas, with the remainder of the parcel consisting of non-buildable slopes or hillsides. The non-urban setting would provide for scattered home sites along ridgelines, which would become the basis for the access roads between parcels. With larger lot sizes, not all areas within each property would be buildable. As such, this alternative is technically feasible. No further response in this regard is warranted.

As discussed in Section 5.0, *Alternatives*, page 5-2, the "One Valley, One Vision" Density-Control Alternative could also create up to 20 parcels, but the land division design would cluster the parcels in a density-controlled project in the eastern portion of the Project site, taking access from stub street Verandah Court in the Southern Oaks community. Similar to the "One Valley, One Vision" Alternative above, the "One Valley, One Vision" Density-Control Alternative would be consistent with the 2012 "One Valley, One Vision" Plan with land use categories of RL 5 (Rural Land 5; 60 acres) and RL 20 (Rural Land 20; 170 acres). Lot sizes would average 15,000 square feet--comparable to the Southern Oaks community. The clustered design would allow for the overlap of individual fuel modification zones, reducing the overall development footprint. The resulting 20-parcel subdivision would have a development footprint, inclusive of fuel modification, of approximately 15 acres, which would be clustered with a common access street connecting to Verandah Court, eliminating connection with Pico Canyon Road. There would be no water storage tanks included in this Alternative, and a secondary emergency access would not be needed or proposed. Indigenous plant species planting of Wickham Canyon would not be a component of this Alternative. Unlike the "One Valley, One Vision" Alternative, the residential units would not be expected to include individual

equestrian facilities. Because of the smaller, 15,000-square-foot lot sizes, the Project design would not require the full 230.5 acres to comply with density standards and would retain an approximately 130-acre remainder parcel along the southern and western property. As such, this alternative is also technically feasible. No further response in this regard is warranted.

RESPONSE TO COMMENT C-9.

The commenter acknowledges the “One Valley, One Vision” Density-Control Alternative would greatly reduce many of the Project impacts, described by the commenter as significant, to a level of less than significant. As in Comment C-7 above, this comment does not specify what impacts are considered significant. The Draft EIR concludes that there are no unmitigated significant impacts; consequently it is not possible to determine to what potential significant impact this comment refers.

The County concurs that the “One Valley, One Vision” Density-Controlled Alternative would have lesser impact than the proposed Project. As discussed in Section 5.0, *Alternatives*, page 5-26 and Table 5-2, *Project Alternatives’ Ability to Meet Project Objectives*, the “One Valley, One Vision” Density-Controlled Alternative is the environmental superior alternative from among the other Alternatives. With 80 percent fewer residential units than the Project, the “One Valley, One Vision” Density-Control Alternative would have proportionally lesser impact than under the Project. However, this “One Valley, One Vision” Density-Control Alternative would not meet the objectives of incorporating multiple fire protection measures to safeguard the community from wildfire hazards, or to construct a significant number of new housing units to assist in providing for the County housing needs. In addition, the “One Valley, One Vision” Density-Control Alternative would not be a fiscally viable project because the number of residential homes would be insufficient to offset the cost to construct the Alternative. This Alternative would also not meet the objective to construct a significant number of new housing units to assist in providing for the County housing needs. Further, as discussed in Section 4, *Environmental Impact Analysis*, the proposed Project would not result in any significant, unavoidable impacts with incorporation of the Project design features and after implementation of the prescribed mitigation measures. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT C-10.

The commenter suggests that the Reduced Density Alternative avoids all substantial impacts and should be the project approved by the County. The commenter continues in stating that this Alternative is the only alternative without adequate impact reduction and public benefits. It is assumed that the commenter meant to write that the Reduced Density Alternative is the only alternative “with” adequate impact reduction. As discussed in Section 5.0, *Alternatives*, Table 5-2, *Project Alternatives’ Ability to Meet Project Objectives*, the Reduced Density Alternative would not meet the objective to construct a significant number of new housing units to assist in providing for the County housing needs. In addition, the Reduced Density Alternative would not be a fiscally viable project because the number of residential homes would be insufficient to offset the cost to construct the Alternative. Further, as discussed in Section 4, *Environmental Impact Analysis*, the proposed Project would not result in any significant, unavoidable impacts with incorporation of the Project design features and after implementation of the prescribed mitigation measures. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT C-11.

The commenter suggests the greenhouse gas emission analysis within the Draft EIR is inadequate, as the greenhouse gas impact from grading should result in a significant impact. Section 4.6, Greenhouse Gas Emissions, of the Draft EIR, analyzes the greenhouse gas impact of the Project.

As discussed in Section 4.6, Greenhouse Gas Emissions, page 4.6-23, the SCAQMD recommends the amortization of construction emissions over a Project lifetime, which is defined as a 30-year period. In general, the SCAQMD has noted that “[b]ecause impacts from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the overall lifetime Project GHG emissions.”³ Greenhouse gas emissions from grading are primarily generated by trucks displacing the soil within the site. Soil would be balanced on the site and would not be imported or exported from the site. As a result, greenhouse gas emissions during the grading phase would not result in significant impacts because soil movement would be confined to the Project site, which results in a lack of haul trucks. Furthermore, as discussed on page 4.6-25, the Project’s greenhouse gas emissions, inclusive of construction-related greenhouse gas emissions, would be less than significant based upon the methodology and model created by CalEEMod. CalEEMod is based on outputs from OFFROAD2011 and EMFAC2011, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including on- and off-road vehicles. CalEEMod outputs construction-related GHG emissions of CO₂, CH₄, N₂O, and CO₂e (see discussion in **Section 4.7**, Greenhouse Gas Emissions of the Draft EIR). The construction grading emissions calculations are provided in Appendix F of the Draft EIR and are considered to be accurate.

RESPONSE TO COMMENT C-12.

The commenter indicates that the Draft EIR is deficient because no public trail is provided from Pico Canyon south through Wickham Canyon to the proposed Project open space. The commenter also states that the impacts to wildlife of the proposed street lighting and Wickham Canyon culvert are not addressed.

The County does not concur with these statements. The County recently completed a multi-year effort to update its General Plan, and included in that effort was the current Regional Trail System Map. Additionally, the multi-year planning effort for the “One Valley, One Vision” plan (Santa Clarita Valley Area Plan) included a regional study for public trails of the area. None of these documents envision a public trail within Wickham Canyon. Therefore, consideration of the impacts of such a trail is unnecessary. The public trail in this area is the Pico Canyon Trail, a segment of which is included in the proposed Project design and analyzed accordingly.

The proposed Project would incorporate an open space linkage between Pico Canyon Creek and Upper Wickham Canyon. This would be achieved by a soft-bottom channel under the secondary emergency access road created by an arched culvert over the Wickham Canyon drainage. All Project culverts are described as project design features (PDF) within **Section 4.8**, Hydrology and Water Quality (Page 4.8-15). The Wickham Canyon Creek Culvert (#2) is described as a 12’ wide by 12’ high arch bridge that would span over Wickham Canyon Creek along the proposed Verandah Court secondary emergency access road. This culvert is further discussed within Section 4.3, Biological Resources (Page 4.3-46), stating “The emergency secondary fire

³ South Coast Air Quality Management District, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, (October 2008).

access road crossing of Wickham Canyon would be designed with a soft bottom with sufficient height and width to allow local wildlife movement to continue along the channel.”

No street lighting is proposed for this emergency access road because the road would not be used as a public street. The Project site is within the Rural Outdoor Lighting District, which would promote dark skies for the enjoyment and health of humans and wildlife. Nighttime lighting would comply with the Rural Outdoor Lighting District standards, including outdoor lighting being fully shielded and no lighting developed as part of the Project would cast directly outward into open space areas. These factors were analyzed within the Draft EIR. As such, impacts related to lighting would be less than significant.

RESPONSE TO COMMENT C-13.

The commenter indicates that the Draft EIR is deficient because it does not propose or analyze the dedication of the open space area to an open space agency or as a public park. As stated above in Response to Comment C-6, the Project proponent is amendable for the open space to be conveyed to an acceptable land steward to manage the dedicated conservation easement for the protection of the biological resources. The dedication of the open space area to an open space agency or as a public park is not an environmental impact requiring impact analysis. This comment does not raise any specific environmental concerns or issues regarding the Draft EIR, as the comment relates more to approval conditions than environmental impacts. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT C-14.

The commenter indicates that the Draft EIR is deficient because it does not address how irrigated perimeter slopes will adversely impact south coast horned lizards by sustaining Argentine ant populations. A final irrigation plan has not been prepared, but an assumption can be made that irrigation would be needed for fuel modification Zones A and B as well as individual yards and common area landscaping. The majority of these areas would be located within the interior of the Project footprint, but manufactured slopes would occupy the perimeter of the development.

Argentine ants may have substantial adverse effects on native vegetation, plant species, and some wildlife species in natural areas adjacent to urban development because their colonies can become quite large and dominate natural areas. These insects can spread where soil moisture is readily available and may spread at least 300 or more feet from irrigated urban areas. Large colonies of Argentine ants may greatly reduce the numbers of the coast horned lizard.

The vast majority of the perimeter around the development footprint would be fuel modification Zone C or manufactured slopes, all of which would consist of native vegetation and would have only temporary irrigation. While this non-irrigated buffer from irrigated landscape areas would reduce the potential for Argentine ant to spread into open space areas, it would not eliminate this possibility. Coast horned lizard has not been confirmed to be present on the Project site, but the potential for this species to occur is high because suitable habitat is present. Because there is the possibility for Argentine ant to spread into open space areas, the following requirement to monitor for the presence of Argentine ant has been added to Mitigation Measure 4.3-9 to read as follows:

Mitigation Measure 4.3-9 Impacts to sensitive plant communities (i.e., Thick-leaved Yerba Santa Scrub, Giant Wild Rye Grassland, California Bush Sunflower Scrub, Toyon Chaparral, and Foothill Ash Scrub) shall be mitigated using one or more of the following:

1. On-site restoration or enhancement of sensitive plant communities (e.g., transplantation, seeding, or planting of representative plant community species; salvage/dispersal of duff and seed bank) at a ratio no less than 1:1 for temporary impacts and 2:1 for permanent impacts, subject to the approval of the County of Los Angeles.
2. Purchase of mitigation credits at an agency-approved off-site mitigation bank within Los Angeles County or in-lieu fee program at a ratio no less than 1:1, subject to the approval of the County of Los Angeles.

If mitigation is to occur on-site or off-site, habitat mitigation and monitoring plan shall be prepared and approved by the County Biologist prior to the issuance of a grading permit. The plan shall focus on the creation of equivalent habitats within disturbed habitat areas of the Project site or off-site. In addition, the plan shall provide details as to the implementation of the plan, maintenance, and future monitoring including the following components:

1. Description of existing sensitive habitats on the Project site;
2. Summary of permanent impacts to sensitive communities based on approved Project design;
3. Proposed location for mitigation areas, either on-site or off-site, with description of existing conditions prior to mitigation implementation;
4. Detailed description of restoration or enhancement goals;
5. Description of implementation schedule, site preparation, erosion control measures, planting plans, and plant materials;
6. Provisions for mitigation site maintenance and control on non-native invasive plants;
7. Provision to monitor development perimeter for presence of Argentine ant and control if present; and
8. Monitoring plan, including performance standards, adaptive management measures, and monitoring reporting to the County of Los Angeles.

RESPONSE TO COMMENT C-15.

The commenter indicates that the Draft EIR is deficient because it does not address in detail what County Flood Control District clean-out requirements would be placed on the proposed storm water infiltration basins. These could have an impact through the potential loss of wetland vegetation. Stormwater flows from the site's impervious areas would be directed to a large, on-site water quality infiltration basin, within which stormwater would percolate into the underlying soil or evaporate into the atmosphere. Routine maintenance activities of the water quality basin by County Department of Public Works Flood Management Division are not typically described in detail at this stage of development, especially when the water quality basins do not currently exist and are generally to be located outside of jurisdictional "waters of the U.S." The

potential periodic maintenance activities within the drainage basins would generally be performed by means of hand and mechanical equipment to maintain baseline elevations and to reduce the impact on basin function as future vegetation growth occurs. In addition, minor repairs to damaged slopes, access road, and outlet structures could take place to maintain the drainage's structural integrity. There would be no perpetual loss of wetland vegetation, but rather periodic thinning of vegetation at a location where such wetland vegetation does not currently exist. Such maintenance activities are not considered a loss of wetland vegetation habitat, since no such habitat exists now and no credit for the creation of such wetland habitat is requested. No further discussion is required.

Letter D

COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294



DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

January 11, 2016

Tyler Montgomery, Senior Assistant
Department of Regional Planning
Land Divisions Section
320 West Temple Street
Los Angeles, CA 90012

Dear Mr. Montgomery:

NOTICE OF COMPLETION AND AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT, "AIDLIN HILLS RESIDENTIAL PROJECT", PROPOSES TO DEVELOP 102 SINGLE-FAMILY DWELLINGS AND ASSOCIATED SUPPORTING INFRASTRUCTURE INCLUDING LOCAL ROADWAYS, WATER AND A PUMP STATION, WATER QUALITY TREATMENT BASIN, AND A FIRE ACCESS ROAD, STEVENSON RANCH (FFER 201600002)

The Notice of Completion and Availability of Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

In Section 4.11 PUBLIC SERVICES, under Subsection 1, ENVIRONMENTAL SETTING, Existing Conditions, Fire Protection, paragraph 1, sentence 7 should be updated to read "The LACFD personnel includes three emergency support teams...".

1

Paragraph 4, sentence 4 should be updated as follows:

2

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

- | | | | | | | | |
|--------------|-----------|------------------|----------------------|-----------|----------------------|-----------------------|-----------------|
| AGOURA HILLS | CALABASAS | DIAMOND BAR | HIDDEN HILLS | LA MIRADA | MALIBU | POMONA | SIGNAL HILL |
| ARTESIA | CARSON | DUARTE | HUNTINGTON PARK | LA PUENTE | MAYWOOD | RANCHO PALOS VERDES | SOUTH EL MONTE |
| AZUSA | CERRITOS | EL MONTE | INDUSTRY | LAKESIDE | NORWALK | ROLLING HILLS | SOUTH GATE |
| BALDWIN PARK | CLAREMONT | GARDENA | INGLEWOOD | LANCASTER | PALMDALE | ROLLING HILLS ESTATES | TEMPLE CITY |
| BELL | COMMERCE | GLENORA | IRWINDALE | LAWDALE | PALOS VERDES ESTATES | ROSEMead | WALNUT |
| BELL GARDENS | COVINA | HAWAIIAN GARDENS | LA CANADA FLINTRIDGE | LOMITA | PARAMOUNT | SAN DIMAS | WEST HOLLYWOOD |
| BELLFLOWER | CUDAHY | HAWTHORNE | LA HABRA | LYNWOOD | PICO RIVERA | SANTA CLARITA | WESTLAKE VILLAG |
| BRADBURY | | | | | | | WHITTIER |

During 2015, the Fire Station responded to 29 fire incidents, 1717 medical incidents, and 309 other/miscellaneous incidents for a total of 2055 emergency incidents with an average emergency response time of five minutes and 48 seconds (5:48 minutes).

2
(cont.)

Paragraph 5, sentence 2 under this Section 4.11, as well as Section 2, ENVIRONMENTAL IMPACTS, Fire Protection, paragraph 2, sentence 2, should be updated to state "the LACFD Developer Fee Detailed Fire Station Plan identifies one replacement station for temporary Fire Station 104 and nine additional fire stations within the Santa Clarita Valley."

3

LAND DEVELOPMENT UNIT:

1. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants.
2. The County of Los Angeles Fire Department's Land Development Unit has no additional comments to the Draft Environmental Impact Report for this project at this time.
3. Should any questions arise, please contact Juan Padilla of the County of Los Angeles Fire Department's Land Development Unit at (323) 890-4243 or Juan.Padilla@fire.lacounty.gov.

4

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.
2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division have been addressed.

5

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Health Hazardous Materials Division (HHMD) of the Los Angeles County Fire Department previously provided our comments regarding this project in July and September 2015. HHMD has no additional comments at this time.

6

Tyler Montgomery, Senior Assistant
January 11, 2016
Page 3

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



KEVIN T. JOHNSON, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

KTJ:ad

RECEIVED
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DEPT OF REGIONAL PLANNING

2.6 RESPONSE TO LETTER D

COUNTY OF LOS ANGELES FIRE DEPARTMENT (LACFD)

Kevin T. Johnson, Acting Chief, Forestry Division Prevention Services Bureau

1320 North Eastern Avenue

Los Angeles, CA 90063

(January 11, 2016)

RESPONSE TO COMMENT D-1.

The County acknowledges the correction of three emergency support teams in Section 4.11, *Public Services*, page 4.11-6. The text will be modified to reflect the correct number, as shown in Chapter 3, *Corrections and Additions to the Draft EIR*, of this Final EIR.

RESPONSE TO COMMENT D-2.

The County acknowledges the correction of the year, number of fire incidents, number of medical incidents, number of other/miscellaneous incidents, number of total emergency incidents, and the average response time in Section 4.11, *Public Services*, pages 4.11-6 and 4.11-7. The text will be modified to reflect the updated data, as shown in Chapter 3, *Corrections and Additions to the Draft EIR*, of this Final EIR.

RESPONSE TO COMMENT D-3.

The County acknowledges the correction of additional fire stations in Section 4.11, *Public Services*, page 4.11-7. The text will be modified to reflect the correct number, as shown in Chapter 3, *Corrections and Additions to the Draft EIR*, of this Final EIR.

RESPONSE TO COMMENT D-4.

Comment acknowledged. As discussed in Section 4.11, *Public Services*, the Project would comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants. No further response in this regard is warranted.

RESPONSE TO COMMENT D-5.

Comment acknowledged. No further response in this regard is warranted.

RESPONSE TO COMMENT D-6.

Comment acknowledged. No further response in this regard is warranted.



Letter E

**COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY**

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

December 30, 2015

Ref File No.: 3544803

Mr. Tyler Montgomery
County of Los Angeles
Department of Regional Planning
Land Division Section, Room 1382
320 West Temple Street
Los Angeles, CA 90012

Dear Mr. Montgomery:

Comment Letter for the Aidlin Hills Residential Project

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on December 9, 2015. We offer the following comments:

1. Previous comments submitted by the Districts in correspondence dated March 18, 2014 (copy enclosed), to Ms. Shannyn Henkel of your agency, still apply to the subject project with the following updated information.
2. The Saugus Water Reclamation Plants (WRP) and the Valencia WRP currently process a combined average flow of 18.9 million gallons per day. Please update throughout the document accordingly.
3. All other information concerning Districts' facilities and sewerage service contained in the document is current.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Adriana Raza
Customer Service Specialist
Facilities Planning Department

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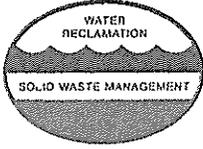
AR:ar

Enclosure

DEPT OF REGIONAL PLANNING

cc: D. Curry
M. Sullivan
M. Tatalovich

DOC: #3560868.DSCV99



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

March 18, 2014

Ref File No.: 2922320

Ms. Shannyn Henkel, Project Coordinator
Alliance Land Planning and Engineering, Inc.
2248 Faraday Avenue
Carlsbad, CA 92008

Dear Ms. Henkel:

Tract Map No. 52796, Stevenson Ranch

This is in response to your request for a will serve letter for the subject project, which was received by the Santa Clarita Valley Sanitation District (District) on February 11, 2014. We offer the following comments regarding sewerage service:

1. The project area is outside the jurisdictional boundaries of the District and will require annexation into the District before sewerage service can be provided to the proposed development. For a copy of the District's Annexation Information and Processing Fee sheets, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the appropriate link. For more specific information regarding the annexation procedure and fees, please contact Ms. Donna Kitt at extension 2708.
2. The wastewater flow originating from the proposed project will discharge to a local sewer line, which is not maintained by the District, for conveyance to either or both the District's Valencia Trunk Sewer, located in Orchard Village Road at Mill Valley Road, or the District No. 32 Main Trunk Sewer, Section 2, located in a private right of way southeast of the intersection of Orchard Village Road and Wiley Canyon Road. The 24-inch diameter Valencia Trunk Sewer has a design capacity of 4.8 million gallons per day (mgd) and is nearing capacity. The 18-inch diameter District No. 32 Main Trunk Sewer, Section 2 has a design capacity of 3.3 mgd and conveyed a peak flow of 2.9 mgd when last measured in 2012. Although there is no relief sewer scheduled for construction at this time, the District is monitoring all proposed developments that would be tributary to the Valencia Trunk Sewer and will undertake improvements so that sewer capacity does not become limited. Prior to the Valencia Trunk Sewer reaching capacity, the design and construction of a relief sewer will be scheduled. Therefore, the availability of capacity within the District's sewerage system should be confirmed as the development of the proposed project proceeds.
3. The District operates two water reclamation plants (WRPs), the Saugus WRP and the Valencia WRP, which provide wastewater treatment in the Santa Clarita Valley. These facilities have a combined design capacity of 28.1 mgd and currently process an average flow of 19.8 mgd.

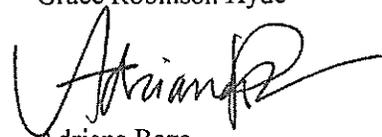
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4. The expected average wastewater flow from the project site is 26,520 gallons per day. For a copy of the District's average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.
5. The District is empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the District's Sewerage System for increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, Will Serve Program, and click on the appropriate link. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727.
6. In order for the District to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of District wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of District facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of District treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the District intends to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of District facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Grace Robinson Hyde



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: D. Kitt
M. Tremblay
J. Ganz

2.7 RESPONSE TO LETTER E

COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

Adriana Raza, Customer Service Specialist, Facilities Planning Department

1955 Workman Mill Road

Whittier, CA 90601

(December 30, 2015)

RESPONSE TO COMMENT E-1.

The commenter acknowledges receipt and review of the Draft EIR. The County acknowledges the correction of the combined average flow of the Saugus WRP and Valencia WRP in Section 6.0, *Other CEQA Considerations*, page 6-20. The text will be modified to reflect the correct number, as shown in Chapter 3, *Corrections and Additions to the Draft EIR*, of this Final EIR.

RESPONSE TO COMMENT E-2.

Comment acknowledged. The comments from the Districts' correspondence dated March 18, 2014 were incorporated into the Draft EIR. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT E-3.

Comment acknowledged. The comments from the Districts' correspondence dated March 18, 2014 were incorporated into the Draft EIR. As such, no further response in this regard is warranted.

Letter F



Jim McDonnell, Sheriff

County of Los Angeles
Sheriff's Department Headquarters

*4700 Ramona Boulevard
Monterey Park, California 91754-2169*



February 2, 2016

Mr. Richard J. Bruckner, Director
Department of Regional Planning
320 West Temple Street, Room 1362
Los Angeles, California 90012

Attention: Tyler Montgomery

Dear Mr. Bruckner:

RECEIVED
2016 FEB -4 AM 8:25
DEPT OF REGIONAL PLANNING

**REVIEW COMMENTS
DRAFT ENVIRONMENTAL IMPACT REPORT
AIDLIN HILLS RESIDENTIAL PROJECT
COUNTY PROJECT NO. 00-136-(5)**

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the Draft Environmental Impact Report (DEIR), dated December 2015, for the Aidlin Hills Residential Project (Project). The proposed Project will construct 102 single-family homes and associated supporting infrastructure in the Stevenson Ranch community of Los Angeles County. The proposed Project is expected to generate a resident population of 306, and will increase average daily traffic on Pico Canyon and Stevenson Ranch Roads, west of Interstate 5, by a total of 970 vehicle trips.

The proposed Project is located within the service area of the Department's Santa Clarita Valley Station (Station). Accordingly, the Station reviewed the DEIR and authored the attached review comments (see correspondence, dated January 19, 2016, from Captain Roosevelt Johnson).

Also, for future reference, the Department provides the following updated contact information for all requests for review comments, law enforcement service information, California Environmental Quality Act documents, and other related correspondence:

Mr. Bruckner

-2-

February 2, 2016

Tracey Jue, Director
Facilities Planning Bureau
Los Angeles County Sheriff's Department
4700 Ramona Boulevard, Fourth Floor
Monterey Park, California 91754
TJue@lasd.org

Attention: Lester Miyoshi, Departmental Facilities Planner
LHMiyosh@lasd.org

1
(cont.)

Should you have any questions regarding this matter, please contact me at (323) 526-5657, or your staff may contact Lester Miyoshi of my staff at (323) 526-5664.

Sincerely,

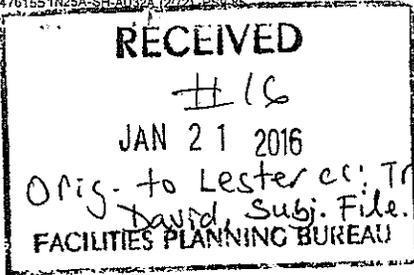
JIM McDONNELL, SHERIFF

A handwritten signature in cursive script, appearing to read "A/Bir. David Colon", written in black ink.

Tracey Jue, Director
Facilities Planning Bureau

COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT

"A Tradition of Service"



DATE: January 19, 2016
FILE NO:

OFFICE CORRESPONDENCE

FROM: ROOSEVELT JOHNSON, CAPTAIN TO: TRACEY JUE, DIRECTOR
SANTA CLARITA VALLEY STATION FACILITIES PLANNING BUREAU

SUBJECT: **REVIEW COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE AIDLIN HILLS RESIDENTIAL PROJECT – COUNTY PROJECT NO. 00-136-(5)**

The Santa Clarita Valley Station (Station) reviewed the Draft Environmental Impact Report (DEIR), dated December 2015, for the Aidlin Hills Residential Project (Project). The proposed Project will construct 102 single-family homes and associated supporting infrastructure in the Stevenson Ranch community of Los Angeles County. The proposed Project is expected to generate a resident population of 306 persons, and will increase average daily traffic on Pico Canyon and Stevenson Ranch Roads, west of Interstate 5, by a total of 971 vehicle trips.

2

Section 4.11 of the DEIR contains various information pertaining to the Station (location, staffing, assets, service area/population, response times, etc.), some of which is obsolete. The Station provides the following updated information:

- As of July 2015, the Station is staffed by 200 sworn personnel and 43 civilian employees;
- As of July 2015, the resident population of the Station's service area is 279,000; and,
- As of July 2015, the Station's service ratio is one deputy per 1,395 residents, (0.72 deputy per 1,000 residents).

3

Section 4.11 of the DEIR also discusses potential Project-related impacts to the Department, including increased demands for service, the possible need for additional staff and assets, cumulative impacts, etc. According to the DEIR, such impacts are expected to be less than significant, and attributes this conclusion on future growths in the Department's operating budget following expected growths in the County's tax-base. In addition, the County can expect to collect developer fees, including Law Enforcement Facilities Fees specified in Chapter 22.74 of the Los Angeles County Municipal Code, for current and reasonably foreseeable future projects. These additional revenue streams would be used by the Department to fund additional staff, facilities, and assets, and would keep the Station's response times within acceptable limits.

4

The DEIR also suggests that the Department can address potential future crime by reviewing development proposals and recommending various strategies and physical design features to discourage criminal behavior and activities.

At this time, the Station does not dispute conclusions made in the DEIR regarding potential Project-related impacts to law enforcement services provided by the Department. However, the Station reserves the right to amend this assessment, if necessary, upon subsequent reviews of the proposed Project.

Thank you for including the Station in the environmental review process for the proposed Project. Should you have any questions regarding this matter, please contact Operations Lieutenant Todd P. Weber at (661) 799-5102.

RJ:TPW:tw

2.8 RESPONSE TO LETTER F

COUNTY OF LOS ANGELES SHERIFF'S DEPARTMENT

Jim McDonnell, Sheriff, and Tracey Jue, Director, Facilities Planning Bureau

4700 Ramona Boulevard
Monterey Park, CA 91754
(February 2, 2016)

RESPONSE TO COMMENT F-1.

The commenter acknowledges receipt and review of the Draft EIR, and provides a brief summary of Project-related improvements. The commenter informs the County that the Project is located within the service area of the Santa Clarita Valley Station. As such, the Santa Clarita Valley Station reviewed the Draft EIR and provided comments in correspondence dated January 19, 2016, from Captain Roosevelt Johnson. The commenter then provides updated contact information for future requests to review law enforcement service information, CEQA documents, and other related correspondence. No further response in this regard is warranted.

RESPONSE TO COMMENT F-2.

The commenter acknowledges receipt and review of the Draft EIR, and provides a brief summary of Project-related improvements. No further response in this regard is warranted.

RESPONSE TO COMMENT F-3.

The County requests correction of the information pertaining to the Santa Clarita Valley Station (location, staffing, assets, service/area population, response times, etc.) within Section 4.11, *Public Services*. The text will be modified to reflect the correct number, as shown in Chapter 3, *Corrections and Additions to the Draft EIR*, of this Final EIR.

RESPONSE TO COMMENT F-4.

The commenter provides a brief summary of the Project analysis and the potential Project-related impact conclusions pertaining to Sheriff Protection within Section 4.11, *Public Services*. No further response in this regard is warranted.

RESPONSE TO COMMENT F-5.

The commenter states that the Station does not dispute the conclusions made in the Draft EIR regarding potential Project-related impacts to law enforcement services provided by the LASD. The County acknowledges the Station reserves the right to amend this assessment, if necessary, upon subsequent reviews of the Project. No further response in this regard is warranted.

Letter G

January 21, 2016

Tyler Montgomery
Department of Regional Planning
Land Divisions Section, Room 1382
320 West Temple Street
Los Angeles, CA 90012



Re: Comments on the Draft Environmental Impact Report for the Aidlin Hills Residential Project (State Clearinghouse Number 2014091027) Vesting Tentative Tract Map 52796

Dear Mr. Montgomery:

Castaic Lake Water Agency (CLWA) staff has reviewed the Draft Environmental Impact Report (DEIR) for the Aidlin Hills Residential Project. The proposed project is Vesting Tentative Tract Map No. 52796 (VTTM 52796) and includes 102 single family dwellings and associated supporting infrastructure. The proposed residential lots would occupy 21.2 acres.

The residential parcels identified on VTTM 52796 are within the CLWA and Valencia Water Company service areas. An approximate one-acre area in the western portion of the proposed development is outside the CLWA service area.

This approximate one-acre area includes an estimated one-half acre of irrigated groundcover and associated deciduous trees and the remaining one-half acre includes two 250,000 gallon water tanks and an associated access road. As the area is located outside of the CLWA service area, water will not be supplied by CLWA or Valencia Water Company to that portion of the project site. Further, although Section 5-13 "Alternatives" discusses potential annexation of western and southern areas for a project alternative, annexation of the one-acre parcel described above is inconsistent with the CLWA's Annexation Policy (copy attached), which does not permit annexations of less than 250 acres in size.

Because water service will not be available for the proposed project's irrigated area outside of the CLWA service area, the landscaping in the area should be redesigned so it does not require irrigation.

Thank you for your consideration of these comments. If you have any questions please contact Rick Viergutz, Principal Water Resources Planner at (661) 513-1281.

Sincerely

Matthew G. Stone
General Manager

Attachment

cc: Ken Petersen, Valencia Water Company

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1
2

ANNEXATIONS TO CASTAIC LAKE WATER AGENCY

SECTION

- 1. ANNEXATION COMMENCEMENT PROCEDURES**
- 2. GENERAL POLICIES RELATED TO ANNEXATIONS**
- 3. FINANCIAL POLICIES RELATED TO ANNEXATIONS**

1. ANNEXATION COMMENCEMENT PROCEDURES

1.1 Request for Annexation, Basic Information, Non-Refundable Payment.

A request for annexation of land(s) (“Annexation Land”) shall be made by the fee owners or their duly authorized agents (“Applicants”) to the Agency and shall be in writing. The request shall include:

- (a) A map of the area proposed to be annexed specifically identifying the location of all assessor’s parcels and roads, and a list of the assessed values by assessor’s parcel number;
- (b) Identification of the current ownership of each parcel;
- (c) A statement of the present use of each of the parcels;
- (d) A statement of proposed land use and/or zoning changes for each parcel, plus a copy of all vesting tentative maps or tentative maps affecting the area proposed to be annexed; and
- (e) For Local Agency Formation Commission informational purposes, a statement setting forth whether the number of voters within the area proposed to be annexed is less than 12, or 12 or more.

Each request for annexation shall be accompanied by a non-refundable payment of up to \$10,000 as determined by the General Manager to reimburse the Agency for staff time and expenses of evaluating, processing the feasibility of the proposed annexation and publishing the petition and preparing and making the filings required by law. If the request involves more than one Water Service Area (“WSA”) of the Agency, then the non-refundable payment for such request will be up to \$10,000 for lands within each WSA.

1.2 Submittal of Request

A request for annexation and all information required in connection therewith shall be submitted to the General Manager.

2. GENERAL POLICIES RELATED TO ANNEXATIONS

2.1 Water Supply

- (a) **Water Demand.** The Agency’s General Manager shall estimate the highest potential water use, in acre-feet per year, (“Water Demand”) for the proposed Annexation Land. This estimate shall be on the basis that the proposed Annexation Land will ultimately be put to its highest and best use, which shall be determined by considering land planning information available, including that of the landowner in determining the Water Demand for the proposed Annexation Land. The sole exception to this highest and best land use standard shall be for lands irrevocably dedicated to a non-irrigated public use, in their natural state, for park or open space purposes.

- (b) **Additional Water Supplies Determination.** The Agency shall evaluate and determine the source of water supply needed by the Agency to serve the Annexation Land (“Additional Water Supplies”) and also the reliability of that source of supply for potable water purposes (“Reliability”). The Additional Water Supplies for the Annexation Land shall be equal to the amount of Water Demand, plus an upward adjustment for the source of supply’s Reliability so as to avoid any diversion from the Agency’s existing water supply from and/or reduction in water supply reliability within the existing Agency service area.
- (c) **Transfers of Water Rights.** Additional Water Supplies, at the reasonable discretion of the Board of Directors and on advice and recommendation of the General Manager, can be provided by the Agency from transfers of contractual rights to the State Water Project Contract Table A Amounts or rights to water from other sources.
- (d) **Agency Vesting.** The rights to the Additional Water Supplies and all appurtenant requirements to exercise such rights for the delivery of the Additional Water Supplies to the Agency must be fully vested in the name of the Agency as a condition precedent to the approval and to completion of the annexation.

2.2 Revenue Plan

Prior to completion of an annexation, the General Manager shall present to the Board a revenue plan concerning the Annexation Lands (“Revenue Plan” herein). The Revenue Plan will include a component for 1% property taxes, a component setting forth the method of payment of Acquisition Costs of the

Additional Water Supplies, Carrying Costs (Section 3.4), and Back Taxes (Section 3.2(a)(1)) as set forth herein.

(a) **1% Property Taxes.** Absent mitigating factors, the Revenue Plan shall include a sum of money dedicated to the Agency that is the same percentage share of 1% property tax monies that exists in the remainder of the Los Angeles and Ventura Counties portions of the Agency that are not impacted by redevelopment projects (“1% Property Tax Transfer” herein). This requirement is to avoid use of the Agency’s existing share of the 1% property tax money to subsidize the costs related to the Annexation Lands. In the event the County of Los Angeles or the County of Ventura does not consent to the 1% Property Tax Transfer, then to the extent the dedication of the share of the 1% property tax money from the Annexation Land is not equal to the same percentage share that exists in the Agency, an equivalent sum of money (“1% Tax Equivalent” herein) shall be paid by the Applicant for the annexing land as set forth in the Annexation Agreement, including by way of stand-by charge.

(b) **Acquisition Costs and Carrying Costs.** The Revenue Plan will set out the acquisition costs and the Carrying Costs to the Agency of the Additional Water Supplies and the method of payment of such obligations by the Applicant to the Agency. Such obligations shall be set forth in the Annexation Agreement.

(c) **Back Taxes.** The Revenue Plan will set forth the manner in which the Back Taxes (Section 3.2(a)(1)) will be paid by the Applicant. Such obligation shall be set forth in the Annexation Agreement.

2.3 Retail Water Service

Retail Water Purveyor Service. The Applicant’s plan for service of water to the Annexation Land must, absent mitigating factors, include contractual or other appropriate provisions for service of the Annexation Land by an existing retail water purveyor of the Agency.

2.4 Additional Approvals

- (a) **DWR.** To the extent required by Agency’s SWP contract, the Director of the Department of Water Resources (“DWR”) of the State of California must approve all changes in the Agency’s service territory prior to completion of an annexation.
- (b) **LAFCO.** The relevant Local Agency Formation Commission must process and approve changes in Agency boundaries if, and to the extent, required by California law.

2.5 No Agricultural Use

The Agency will not process any annexation where Agency water will be used for agricultural purposes. The Agency, further, will condition all annexations, to the maximum extent permitted by law, to preclude use of water of the Agency for agricultural purposes.

2.6 Contiguous Territory

An area proposed for annexation shall be contiguous to the Agency. No annexation shall leave an unannexed area entirely or nearly surrounded by area annexed to the Agency, unless the Board specifically finds that the Agency’s interests will not be adversely affected by such a configuration of annexed territory.

2.7 Minimum Acreage

The Agency, absent mitigating factors, will not process an annexation involving less than 250 acres. This minimum acreage requirement may, however, be satisfied by simultaneous annexation of smaller parcels whose combined acreage exceeds 250 acres.

2.8 Annexation Terms and Conditions

All annexations shall be subject to the following terms and conditions:

- (a) **Regulations.** The sale and delivery of all water by the Agency, regardless of the nature and time of use of such water, shall be subject to regulations promulgated from time to time by the Agency, and also those regulations promulgated by the retail water purveyor(s) serving the proposed Annexation Land.
- (b) **No outside use.** Except upon terms and conditions specifically approved by the Board, water sold and delivered by the Agency shall not be used in any manner which intentionally or avoidably results in its use outside the Agency service area.
- (c) **No additional works.** The Agency shall not be obligated to provide additional works or facilities, necessitated by the annexing area, as defined by Agency policies in effect from time-to-time for the delivery of water to the Annexation Land from works or facilities owned and operated by the Agency.
- (d) **Common pool.** Except as set forth in this paragraph or in the Annexation Agreement, Additional Water Supplies acquired to meet the Water Demand of Annexation Land is a water right of the Agency for use in its service area, including the Annexation Land when annexation is

completed. Subject to the Water Demands on the Agency, the Additional Water Supplies may be used for water banking and other uses as deemed appropriate at the discretion of the Board and is not dedicated solely for use on the Annexation Land. Notwithstanding the foregoing, if, pursuant to the Annexation Agreement, the Applicants are required to pay the capital and/or the carrying costs for the Additional Water Supplies as described in Section 3.2(a)(2) of this Policy, and are not in default of such obligation as determined by a final judgment, the Agency shall not treat such Additional Water Supplies as water available to support “can-serve”, “will-serve”, or “water availability” letters (“Water Availability” herein) for any new development within the service area of the Agency and shall, upon request, provide the retail water purveyor serving the Annexation Land with the necessary water supply assurances to enable the retail provider to issue Water Availability letters for the Annexation Land to the extent the Additional Water Supplies would be sufficient to support such letters.

- (e) **Lead Agency.** At its election, the Agency, in cooperation with the LAFCO, shall be the lead agency for purposes of compliance with the California Environmental Quality Act and, in any event, shall direct, conduct, and have final approval of the environmental analysis for the Additional Water Supplies.
- (f) **Water Efficiency Guidelines.** To the extent practicable, the retail water purveyor(s) and owner(s) of parcels, as appropriate, within an Annexation Land, shall comply with all Agency rules and regulations, including the following:

- (1) **Conservation.** Annual water use shall be minimized by incorporating water conservation measures into the development plans. Use of local groundwater, surface water, and recycled wastewater supplies shall be maximized to reduce demands on the Agency.
 - (2) **BMPs: Best Management Practices (“BMPs”)** conservation measures, as identified by the Agency from time to time, shall be applied uniformly in all new and existing developments within the annexed area. At least one model home constructed in each new development within the proposed Annexation Land shall demonstrate a water conserving landscape.
- (g) **Coordination Compliance.** The retail water purveyor(s), within which the proposed Annexation Land is or will be located, and the Agency shall coordinate to assure compliance with these provisions so that information is provided to the Agency regarding such compliance.

3. FINANCIAL POLICIES RELATED TO ANNEXATIONS

3.1 Annexation Agreement; Additional Water Supplies; Processing Costs, and Annexation Charges

- (a) **Annexation Agreement.** An Applicant shall enter into an agreement with the Agency whereby the Applicant agrees to pay all Agency Processing Costs and Annexation Charges as defined herein (“Annexation Agreement” herein). Unless approved otherwise by the Board, all Processing Costs must be paid as a condition precedent to completion of the annexation. The Annexation Agreement shall provide the

security for and method of payment of the Processing Costs (if appropriate), the 1% Tax Equivalent, and Annexation Charges as determined appropriate by the Board.

- (b) **No Guarantee.** The Annexation Agreement will recite that obtaining amendments in the Agency's State Water Contract or new contracts to secure Additional Water Supplies from other sources is not a routine process, could take considerable months or years, and that there can be no guarantee or prediction of success for the annexation and/or contract amendment, or new contract negotiation efforts.
- (c) **Assumption of Risk.** The Annexation Agreement will explicitly provide that the Agency lacks legal authority in any way to predict its decision concerning a proposed annexation prior to completion of required environmental review processes, and that the Applicant assumes all financial risk related to ultimate Agency Board decisions to approve or to deny annexations in whole, or in part.
- (d) **Processing Deposit.** Unless a lesser sum is approved by the Board, the Annexation Agreement shall require a deposit of \$50,000 by each Applicant (in addition to the initial payment of up to \$10,000) as a condition of processing or continuing to process the annexation. The deposit will be used to pay for Processing Costs. Further, whenever the Agency so requests, additional sums must be paid by the Applicant to restore the deposit to \$50,000. Following completion of the annexation or termination of the annexation process, any unexpended deposit money shall be returned to the Applicant. Periodic accounting of the expenditures shall be provided by the Agency to the Applicant.

- (e) **Board Approval.** All Agency-Applicant Annexation Agreements shall be subject to Board approval. The terms will differ for individual annexations because all annexations are unique and raise special issues.
- (f) **No Subsidy.** The obligation for the Applicants to pay processing costs is to ensure that the Applicant is not subsidized in any way by existing Agency ratepayers and taxpayers.
- (g) **Processing Costs.** Processing Costs, include, but are not limited to, title reports, Carrying Costs incurred before completion of annexation, staff time, engineering, environmental, and legal services, including the negotiation and amendment of the Annexation Agreement, the Agency's State Water Contract, or negotiation and execution of contracts to secure Additional Water Supplies from other sources and litigation, including costs and attorneys' fees, if any, required to complete the annexation ("Processing Costs" herein).

3.2 Annexation Charges

- (a) **Condition Precedent.** The annexation charge shall be paid to the Agency pursuant to the Annexation Agreement as a condition precedent to any obligation of the Agency with regard to providing Additional Water Supplies, and shall consist of the following components ("Annexation Charges" herein):
 - (1) **Back-Tax Computation.** In order to equitably share in benefits provided by the Agency through its existing Agency-wide facilities, the annexing area shall be required to pay an amount that is equivalent to total Agency ad valorem taxes that would have been levied

on the annexation area lands had they been included in the Agency territory since 1963 (“Back Tax” or Back Taxes” herein). Payment for Back Taxes for Agency facilities shall be calculated as follows: Applicant will provide the Assessor’s Parcel Number for the Annexation Land. The assessed value of the parcel will be obtained from the latest Assessor’s list in Los Angeles or Ventura County where the Annexation Land is located. Based on past history of increases in assessed value, the assessed value of the parcel(s) will be calculated for each year back to 1963. The computed annual assessed value will then be multiplied by the combined tax for that year to determine the amount of tax that would have been paid in that year. The result of each year’s calculation will then be brought forward to reflect the current value of those annual amounts. The calculation will use the interest rate the Agency received for its investments during each period. From 1963 to 1986, the Agency invested its savings in Certificates of Deposit. From 1987 forward, the Agency also deposited funds in the Local Agency Investment Fund. The total sum of payments from 1963 to the present represents the Back Tax amount for those parcels to be annexed.

- (2) **Payment for Additional Water Supplies.** Applicant will, at its sole expense, pay for the Additional Water Supplies needed to serve the proposed Annexation Land. The payment may be made by issuance of Agency debt secured by assessments, charges, standby charges, fees, or taxes on the proposed Annexation

Land. The Applicant will accordingly pay, as part of its Annexation Charges, the costs of Additional Water Supplies, including, without limitation, the “purchase or transfer price” exacted by the holder of the right to the water to be transferred to the Agency, any payment for contractual or other rights required for the Agency to use water transportation, water storage, or other facilities, cost of financing, and issuance of securities (“Acquisition Costs” herein, “Carrying Costs” (as defined in Section 3.4) to be paid after completion of annexation, and the 1% Tax Equivalent (§2.2).

3.3 Payment Requirement in Full

All Processing Costs shall be paid in full prior to completion of the annexation and Annexation Charges paid as set forth in the Annexation Agreement.

3.4 “Carrying Costs” Defined

The term “Carrying Costs” refers to any required payments to the State of California Department of Water Resources for additional Table A Amount, or to the contracting party with the Agency for other source of water supply.

3.5 Facility Capacity Fees

Upon development of property within the Annexation Land, Agency facility capacity fees shall be payable pursuant to then existing Agency policies as a condition precedent to water service. To the extent the Annexation Charges include capital costs covered by Agency facility capacity fees, a credit against such fees will be provided.

2.9 RESPONSE TO LETTER G

CASTAIC LAKE WATER AGENCY (CLWA)

Matthew G. Stone, General Manager

27234 Bouquet Canyon Road

Santa Clarita, CA 91350

(January 21, 2016)

RESPONSE TO COMMENT G-1.

The commenter acknowledges receipt and review of the Draft EIR, and provides a brief summary of Project-related improvements. The commenter acknowledges the proposed Project residential parcels are within the CLWA and Valencia Water Company service areas, with approximately one acre in the western portion of the proposed Project design located outside of the CLWA service area. The approximate one-acre area includes an estimated one-half acre of possibly irrigated groundcover and associated landscape vegetation, and the remaining one-half acre includes the two proposed 250,000-gallon water tanks and an associated access road. The commenter states that, as the area is located outside of the CLWA service area, water would not be supplied by CLWA or the Valencia Water Company to that portion of the Project site. Cris Perez, Vice President of Operations at the Valencia Water Company, confirmed that the two proposed water tanks are allowed to be placed outside of CLWA's service area. The two water tanks would belong to the Valencia Water Company, and as such, be filled with Valencia Water Company water. Cris Perez also stated that water from a water meter located within the CLWA service area may not be used to irrigate land outside of the CLWA's service area. The Project proponent has indicated that all plants in the small area located outside the CLWA service area would consist of locally indigenous species, which would temporarily receive imported water/irrigation from mobile tanks during initial establishment only.

Referencing the "One Valley, One Vision" Alternative, the commenter states that annexation of the one-acre area described above is inconsistent with the CLWA's Annexation Policy, which does not permit annexations of less than 250 acres. However, the Project does not require annexation for a period of temporary irrigation to establish locally indigenous species on the manufactured slopes. No such annexation is proposed for the Project.

As discussed in Section 5.0, *Alternatives*, page 5.13, annexation to the CLWA service area would be necessary prior to development implementation of the "One Valley, One Vision" Alternative. As indicated by this comment, annexation to the CLWA would not be possible because the Project site area not currently within the CLWA service area is less than the minimum 250 acres required. In order for annexation to be possible, the Project area would need to be included with additional properties, such as the Mountains Recreation and Conservation Authority property to the west, for a minimum of 250 acres. Prior to approval of annexation to the CLWA service area, the Project proponent and other property owners would be required to guarantee a water supply source for the Project by contracting with a water bank or water wholesaler for the permanent transference of water to the Castaic Lake Water Agency.

RESPONSE TO COMMENT G-2.

The commenter further elaborates on Comment G-1 above to recommend that landscaping for areas not within the CLWA service area be designed to not require irrigation. As stated in Response to Comment G-1, the landscape materials to be used in the non-service area location would be locally indigenous species such

that irrigation would be needed only during the initial establishment period. Such temporary water supply can be trucked to this location for the brief establishment period. This provision for the use of locally indigenous plant species for the landscaping outside of the CLWA service has been added to Project Design Feature 1-4.

Letter H

Tyler Montgomery

From: Caitlin Gulley [<mailto:cgulley@tataviam-nsn.us>]

Sent: Tuesday, December 15, 2015 12:17 PM

To: Tyler Montgomery

Subject: Tribal Consultation: Aidlin Hills Residential Project - Permit No. 00-136 - Draft Environmental Impact Report (DEIR); Additional Mitigation Recommendations and DEIR Revisions



Fernandeno Tataviam Band of Mission Indians

Tribal Historic & Cultural Preservation

Tyler Montgomery
Department of Regional Planning
Land Divisions Section, Rm. 1382
320 West Temple Street
Los Angeles, CA 90012

**RE: Aidlin Hills Residential Project - Permit No. 00-136 - Draft Environmental Impact Report (DEIR);
Additional Mitigation Recommendations and DEIR Revisions**

Dear Mr. Montgomery,

The Fernandeno Tataviam Band of Mission Indians (Tataviam) is thankful for the opportunity to comment on the above referenced Aidlin Hills Residential Project (Project) Draft Environmental Impact Report (DEIR). We request that the following additional mitigation recommendations and the attached DEIR revisions be adopted into the Final Environmental Impact Report (FEIR) and that we have the opportunity to review the FEIR over a one week period, prior to the FEIR being published.

Additional Mitigation Recommendations:

- We recommend that one monitor be present per excavation team.
- We recommend that the oak tree planned for removal be examined by professional Tribal Historic and Cultural Preservation personnel of the Tataviam prior to the oak being removed and prior to ground disturbance within one quarter mile of the oak, at the expense of the applicant.
- We recommend that the oak tree be evaluated for boxing and transplanting. Should the oak tree prove healthy enough to be boxed and transplanted, as determined by a professional arborist contracted by the applicant, we recommend that the oak tree be transplanted elsewhere within the project property.

Revisions:

- Revisions 1-2 are discussed in the **attached** document and produced by Kimia Fatehi, who conducted the initial consultation for the Project.
- Revision 3: In accordance with the State of California Native American Heritage Commission Guidelines for Native American Monitors, the FEIR should add the authority for Native American monitors to halt ground disturbing activity to evaluate possible cultural finds to Mitigation Measure 4.4-2.

3

Please contact Caitlin Gulley with any questions or concerns.

Respectfully,

--

Caitlin Gulley, Director
Tribal Historic and Cultural Preservation Department
Cell: [\(661\) 433-0599](tel:6614330599)
Office: [\(818\) 837-0794](tel:8188370794)
cgulley@tataviam-nsn.us

Fernandeño Tataviam Band of Mission Indians

1019 Second Street
San Fernando, California 91340
Phone: (818) 837-0794 Ext. 208
Website: <http://www.tataviam-nsn.us>

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Following the word “**ERROR**” I have copied the sentence as written in the DEIR. I have then added **personal commentary**, *not* to be included, but for background information. Lastly, following the word “**CORRECTION**” I have written the sentence that may be pasted in the final EIR.

Revision #1:

ERROR: By 1834, the descendants of the Tataviam had married into other groups at the mission or in the Tejon Region.

Personal Commentary: this implies that the Tribe no longer existed because they married other groups, which is incorrect.

CORRECTION SENTENCE TO PASTE: In 1834, the Indians were to retain Mission land under government trust and protection, and had the right to organize electoral village governments under the Secularization Act. They retained their Tataviam identity, and continued to intermarry with lineages associated with the neighboring villages, as they did prior to the Mission period.

4

Revision #2:

ERROR: According to Kimia Fatehi, representative for the Tataviam Tribe, “these tribelets contained 250 to 300 people, with lineages having approximately 100 people. Through the San Fernando Mission registers [which are not open to the public], lineages from prehistoric tribelets can be traces to currently enrolled Tataviam tribal members today.

Personal Commentary: Actually, in our email exchange, I was still quoting Kroeber. So, the portion that reads: “these tribelets contained 250-300 people” is still a quote from Kroeber (from the previous sentence.) Also, most of the mission registers *are* accessible... I’m not sure why I’m quoted saying that, so I kindly request that that sentence, along with my name in the beginning, be removed.

CORRECTION SENTENCE TO PASTE: According to the contemporary Fernandño Tataviam Band of Mission Indians, the entire Fernandño region (areas from which Indians were recruited to Mission San Fernando) formed a network of intermarriages that produced the basis for cooperative economic and social exchanges. Tribelets were composed of one lineage. Multiple families existed at each village within a lineage. Each family had a captain, or leader, who communicated with the principle village headman, or Tomeár. Lineages, which can be found among individuals in the San Fernando Mission registers, are traced to currently enrolled Tataviam tribal citizens today (FTBMI personal communication, 2015).

5

2.10 RESPONSE TO LETTER H

FERNANDENO TATAVIAM BAND OF MISSION INDIANS TRIBAL HISTORIC & CULTURAL PRESERVATION

Caitlin Gulley, Director, Tribal Historic and Cultural Preservation Department

1019 Second Street
San Fernando, CA 91340
(December 15, 2015)

RESPONSE TO COMMENT H-1.

The commenter acknowledges receipt and review of the Draft EIR. The commenter further requests the opportunity review the Final EIR at least one week prior to the certification of the Final EIR, as is required under CEQA. As such, no further response is needed.

RESPONSE TO COMMENT H-2.

Under the commenter's Additional Mitigation Recommendations, a recommendation was made for "...one monitor [to] be present per excavation team." Mitigation Measure 4.4-4 already accommodates the presence of a monitor consistent with this comment.

The commenter further recommends that the oak tree requested for removal be examined and evaluated for boxing and transplanting elsewhere within the property. This oak tree is a solitary tree (not found within a cluster) and shows no exceptional aesthetic quality but has several dead limbs as a result from the fire that occurred in 2010. Moreover, no information has been obtained that would suggest the tree is of particular importance or significance. Based on these findings, the environmental impact of removing the oak tree continues to be less than significant.

RESPONSE TO COMMENT G-3.

The commenter provides new and modified text that has been incorporated into the Final EIR, and is reflected in Chapter 3, *Corrections and Additions to the Draft EIR*. For recommended Revisions 1 and 2, please refer to Response to Comment H-4 and Response to Comment G-5, respectively. Under Revision 3, "the FEIR should add the authority for Native American monitors to halt ground disturbing activity...". Mitigation Measure 4.4-4 already accommodates the authority to halt ground disturbing activity consistent with this comment.

RESPONSE TO COMMENT H-4.

The commenter provides new and modified text that has been incorporated into the Final EIR, and is reflected in Chapter 3, *Corrections and Additions to the Draft EIR*. Under Revision #1, the correction sentence has been added: "In 1834, the Indians were to retain Mission land under government trust and protection, and had the right to organize electoral village governments under the Secularization Act. They retained their Tataviam identity, and continued to intermarry with lineages associated with the neighboring villages, as they did prior to the Mission period (FTBMI personal communication, 2015)".

RESPONSE TO COMMENT H-5.

The commenter provides new and modified text that has been incorporated into the Final EIR, and is reflected in Chapter 3, *Corrections and Additions to the Draft EIR*. Under Revision #2, the correction sentence has been added: “According to the contemporary Fernandeano Tataviam Band of Mission Indians (FTBMI), the entire Fernandeano region (areas from which Indians were recruited to Mission San Fernando) formed a network of intermarriages that produced the basis for cooperative economic and social exchanges. Tribelets were composed of one lineage. Multiple families existed at each village with a lineage. Each family had a captain, or leader, who communicated with the principle village headman, or Tomár. Lineages, which can be found among individuals in the San Fernando Mission registers, are traced to currently enrolled Tataviam tribal citizens today (FTBMI personal communication, 2015).”

SCOPE

Santa Clarita Organization for Planning and the Environment

TO PROMOTE, PROTECT AND PRESERVE THE ENVIRONMENT, ECOLOGY
AND QUALITY OF LIFE IN THE SANTA CLARITA VALLEY

POST OFFICE BOX 1182, SANTA CLARITA, CA 91386



1-20-15

Tyler Montgomery
LA County Dept. of Regional Planning
320 W. Temple St.
Los Angeles, CA 90012

Via email to tmontgomery@planning.lacounty.gov

Re: Comments on the Aidlin Project # 00-136, VTT 52796 and associated approvals

Dear Mr. Montgomery:

This project proposes to build 102 single-family dwellings and associated supporting infrastructure including local roadways, two 250,000-gallon water tanks with a pump station, water quality treatment basins, and an emergency secondary fire access road within a 230.5-acre Project site in the urban/wildland interface area of Pico Canyon. The Project would require approximately 1,600,000 cubic yards of cut material, which includes 300,000 cubic yards of over excavation.

Public Process

We continue to object to the County Regional Planning Department’s failure to hold hearings before the full regional Planning Commission for the Draft EIR. While the Planning Commission heard mundane issues such as cell towers and alcohol permits during the period when a hearing examiner who has no decision making power, conducted a public hearing for this project. Thus, this 102 unit project in a high fire hazard zone that may put future residents in danger will receive only cursory review at the FEIR stage from the Commission. We assert that the County’s failure to give such questionable projects only cursory review in an effort to “streamline” the CEQA process, instead constitutes an abdication of its duty to fully vet such projects. Failure to ensure that future residents are safe from fires, that the General Plan is followed and that the environment is protected will rest solidly with your Department because of this lack of good process.

1

General Plan Amendment Required

First, we believe that this project is not consistent with the current general plan. Just because an application was made over 17 years ago does not constitute a legal reason for failure to be constituent with existing plans, including both the County General Plan and OVOV, approved in 2012. The OVOV area Plan update for the SCV also promised our community a green belt around the Valley and that additional growth would focused on infill. Again, a Plan Amendment must be required for this proposal. Please explain why it is not being required.

2

We oppose the proposed zone change required for this project. It does not meet the burden of proof required for such a change since there are thousands of already approved but unbuilt units in the Santa Clarita Valley. There is no need for a project like this in a high fire hazard area

where substantial public funds will be required to extend water and sewer services. With all the already approved but unbuilt units in the Santa Clarita Valley, there is no requirement for the additional housing.

2
(cont.)

The DEIR seems to make several statements that are out of date and should be corrected for accuracy. It describes a grading schedule which will begin in Nov., 2015 (already out of date since this is Jan 2016 and the project has yet to receive several approvals), and a “draft” Los Angeles County General Plan, which in fact was approved in 2015. (p.4.1-2)

3

Cumulative Analysis Incomplete

While some unbuilt projects are listed on page 3-2 of the DEIR, many already approved but unbuilt housing projects have not been disclosed, such as Tesoro del Valle, West Creek, Tick Canyon, Spring Canyon and the Keystone project. These projects represent thousands of units which were not included in the analysis. Failure to disclose this huge backlog of unbuilt units affects the decision makers’ ability to judge whether the burden of proof presented in the approval process is accurate. Without adequately accounting for all unbuilt units that will require services, the DEIR will lead to a false assessment of infrastructure needs. This invalidates the cumulative analysis. Please identify all housing that is approved but unbuilt in the SCV and discuss how the County will meet any burden of proof required to approve this additional unneeded housing project. Please include all housing in the cumulative analysis section.

4

Fire Hazard

According to the DEIR, this project is located in a Very High Fire Hazard Zone¹, and has in fact suffered a major fast moving, wind driven wildfire as recently as 2003. However, the design proposal includes only one road for ingress and egress. We assert that only one egress creates a severe public safety issue and should preclude approval for this project. The project should not be approved without a second means of evacuation during a fire or other emergency.

The fire hazard section describes a few mitigation measures such as stucco sides on houses that are already required by the building codes. Such measures will not protect homes in this area when faced with a wildfire under high wind conditions as regularly occurs in this area. We therefore oppose approval of this project when there is only one road out and in. It creates a dangerous condition for future residents and makes it hard for fire trucks to access the area.

5

Last, residents will have trouble obtaining fire insurance in this area. If they can get it at all, it will be very costly. Notification and disclosure of this fact should be required to be made to any future home purchasers.

Defending this area from wild fires will be very expensive for the County. We ask the County provide a cost of services study for this development and begin to generate fees to ensure that adequate financing of fire services can be provided, or if new housing should be permitted at all in such areas.

Sewage

There are no sewage facilities that access this project. New sewage lines will have to be extended. No analysis of whether or not the nearest line (ending at Southern Oaks) is adequate

6

¹ DIER Page 4.7-20

to handle this additional flow, was included in the DEIR. Nor were any impacts from extending the sewage line described.

6
(cont.)

Water Supply

In our Notice of Preparation comments we brought up several issues which the DIER now fails to address. We re-iterate our NOP comments here and ask that they be addressed in the DEIR.

While we generally concurred with the findings of the initial study and the discussion areas proposed for the EIR, we stated that the initial study had erroneously concluded that there would be no impact to water supply.

We re-iterate – we are now in the third year of a drought that has impacted the entire state. The Governor has declared a drought emergency, which according to our last two Urban Water Management Plans should result in a slowdown of new development approvals and a close look at available supplies. The Santa Clarita Valley is currently under drought restriction water rationing that requires all residents to cut back on their water usage by 28%. It is hard to understand how the water agencies, especially Castaic Lake Water Agency, can have accurately projected sufficient water supplies, if we now must cut back while having less than HALF the population anticipated in the general plan update. One can only conclude that the modeling is inaccurate and must be re-evaluated. The water information in the Initial Study does not correctly describe this situation. The DEIR should thoroughly address the water supply availability in the Santa Clarita Valley.

7

Neither has CLWA accurately disclosed the spread of the ammonium perchlorate pollution plume that has caused the closure of two additional water supply wells, V201 and V205. Both these wells previously supplied water to the Valencia Service area identified as the supplier for this project. Therefore a current Water Supply Assessment for this project should be requested and reviewed for accuracy by a County planner familiar with water issues. The issue of drinking water supply pollution by ammonium perchlorate and VOCs must be thoroughly addressed in the EIR. All well closures and the reduction in supply due to the closures should be included in the EIR. Any spread of the pollution plume that is being caused by continued pumping should be discussed.

Further, the Aidlin project appears to be outside the service territory of both Castaic Lake Water Agency and Valencia Water Company. Castaic Lake Water Agency illegally acquired Valencia Water Company by means of an eminent domain proceeding in 2012 without receiving permission to expand their service area from the legislature as required by their enabling legislation. This acquisition is now under Court challenge. Certain other statutes were also violated so that ownership and regulatory oversight of Valencia Water Co. is now in doubt. Due to these facts, the California Public Utilities Commission revoked Valencia's Certificate of Public Convenience and Necessity. It is now unclear who has regulatory oversight of this agency and how water service to new customers will be provided. This issue must be addressed before any approvals relying on water service from Valencia Water Co. are granted. (The CPUC Decision was attached as Exhibit 1 to our NOP comments)

8

The DEIR fails to disclose that this project is not currently in the Valencia Water Company Service area and would have to be annexed in, instead relying on an email to show

adequacy of water supply is not acceptable. In fact, the entirety of the water supply analysis seems to be one paragraph that includes an estimate of how much water will be used without any disclosure as to how this figure was derived. It includes the sentence “*According to the Valencia Water Company, there is adequate water supply for the Project.*” (pg. 6-22) which is apparently based on an email.

8
(cont.)

Since no Water Supply Assessment was required or supplied, one cannot know the current impacts or cumulative impact of this project in light of the Drought Emergency. This lack of information makes the water section wholly and completely inadequate. An adequate water section should be provided and the DEIR re-circulated to interested parties.

9

Traffic /Schools

We do not understand why elementary students from this project would be unable to attend the local elementary school on Pico Canyon Rd. However, if that is the case, the traffic must be re-evaluated. Traffic created during school drop off and pick up at Pico Elementary, added to project traffic generation as future residents leave to pick up or deliver their own children, seems not to have been considered. Also longer school commutes from this project to the Junior High and High School must be included in the Traffic, GH Gas and air quality sections.

10

This also creates a public safety issue as it would additionally complicate any evacuations necessitated by a fire or other emergency. Again, we believe the road infrastructure for this project is extremely unsafe for a high fire hazard area. The existence of Pico Elementary adds to this safety issue.

Biology

The mitigation for biological impacts should include impacts caused by the huge areas that must be cleared for fire hazard buffer areas around the project area.

The project proponent states he will build wetlands and move any amphibians that are found, but does not say where these manufactured wetlands will occur. It should be noted that manufactured wetlands do not have a good success rate.

The DEIR seems to depend on only two recent surveys taken in 2014 to compile the biological data. Surveys must be made during breeding or flowering season, or within a certain temperature range, etc to accurately locate the presence of various flora and fauna. It does not seem possible that adequate surveys could have been provided with only two survey dates. In our NOP comments we requested that surveys for threatened and endangered species present in the area be conducted along the blue line streams. No such surveys were conducted

11

Avoidance of any impacts to blue line streams is the preferable alternative, but an avoidance alternative was not included.

We concur with the comment made by the SMMC that the biological mitigation measures only address giving animals in the development footprint some warning before their habitat is destroyed, or they represent deferred mitigation with undefined mitigation sites and performance criteria. The DEIR biological mitigation measures are inadequate to compensate for the loss of 66 acres of habitat in the Santa Clarita Woodlands area. The protection of the open space is valuable but, it does not offset the direct permanent impacts to at least 66 acres of habitat.

12

Conclusion

The DEIR fails to include many approved but unbuilt projects located in the SCV in its cumulative analysis projects and the water supply section is totally inadequate.

We therefore ask that the Regional Planning Department require the developer to provide an adequate disclosure of these issues and re-circulate the document when this information is provided. We also request that an alternative which avoids the blue line streams be included in the re-circulated DEIR. It should include an application for a General Plan Amendment.

13

We oppose further incursions into fire hazard areas not only because of the danger to future residents, but also due to the cost of defending such residents from the likely increased occurrence of wildfires. A cost analysis for firefighting protection of this area should be included in the DEIR.

14

Thank you for considering our comments.

Sincerely,



Lynne Plambeck
President

2.11 RESPONSE TO LETTER I

SANTA CLARITA ORGANIZATION FOR PLANNING AND THE ENVIRONMENT (SCOPE)

Lynne Plambeck, President

P.O. Box 1182

Santa Clarita, CA 91386

(January 20, 2016)

RESPONSE TO COMMENT I-1.

This commenter objects to the County of Los Angeles Department of Regional Planning's procedure in failing to hold hearings before the Planning Commission for the Draft EIR.

According to the DRP CEQA Processing Manual, the Hearing Examiner process allows a public hearing during the Draft EIR public comment period. The Hearing Examiner's role is to take in comments on the Draft EIR prior to a decision on the entitlements being made at the public hearing. No decisions are made on the Draft EIR or the project at this hearing. The Hearing Examiner does not express any opinions on the project. Most cases will go to the Hearing Examiner, unless the department director decides otherwise.

A Hearing Examiner hearing was conducted for the Aidlin Hills Draft EIR on January 11, 2016. A newspaper notice was published in *The Signal* and *La Opinion* on December 8, 2015. Notices to property owners and tenants located within a 1,000-foot radius of the property boundaries, and to two local libraries, were mailed on December 1, 2015. Notices were verified to be posted on the subject property and were made available on the DRP's website on December 1, 2015. On December 7, 2015, a Notice of Completion and Notice of Availability (NOC-NOA) of a Draft EIR was posted at the Los Angeles County Clerk's office. The NOC-NOA was sent by mail or delivery service to required agencies, including the State Clearinghouse and other interested parties. The NOC-NOA was also posted on the Project site and on the DRP's website. The formal public review period for the Draft EIR was from December 8, 2015 to January 21, 2016. Comments on the Draft EIR were received during the comment period, and those comments are responded to in this Final EIR. The Final EIR, together with the Project, will be submitted to the County of Los Angeles Regional Planning Commission (the Commission) for review, and the Commission will consider approval of the Project and certification of the EIR. The Commission considers the entire EIR, both the Draft EIR and the Final EIR before making a decision on the Project. The Commission does not make only a cursory review of the EIR and the Commission considers all aspects of the Project, including the safety of future residents.

This comment does not raise any specific environmental concerns or issues regarding the Draft EIR besides stating that the Project site is located in a high fire hazard zone. Please refer to Section 4.11, *Public Services* and Section 4.7, *Hazards and Hazardous Materials*, of the Draft EIR, for an environmental analysis of fire hazards. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT I-2.

The commenter states the opinion that the proposed Project design is not consistent with the current General Plan and as such, the current application should require a plan amendment. The commenter also claims that the "One Valley, One Vision" plan for the Santa Clarita Valley promised a greenbelt around the valley.

The 2012 Santa Clarita Valley Area Plan became effective on the respective dates of adoption and, as required by State law, all subsequent planning and development decisions within the unincorporated Santa Clarita Valley planning area are determined to be consistent with these documents, “except as provided herein for any land use applications pending during the plan preparation and adoption process.” (2012 Santa Clarita Valley Area Plan, Page 3). As is stated in **Section 2.0**, Project Description (Page 2-1) and **Section 4.9**, Land Use and Planning (Page 4.9-4) in the Draft EIR, the original application for the Project was filed in 2000, prior to the adoption of the 2012 Santa Clarita Valley Area Plan and, thus, does not fall under the jurisdiction of the 2012 plan. Additionally, **Section 4.9**, Land Use and Planning (Page 4.9-12) explains that because the Project’s application was pending at the time of the adoption of the Santa Clarita Valley Area Plan in 2012, the land use designations of the prior SCV Area Plan are applicable to the site. Under the prior SCV Area Plan, the applicable land use designations are HM (Hillside Management), U2 (Residential - 3.4-6.5 du/ac), and W (Floodway/Floodplain). As a consequence, no plan amendment is required.

One of the planning issues discussed during the adoption of the 2012 Santa Clarita Valley Area Plan was the “Preservation of an open space green belt around the urbanized central portions of the Valley, in order to preserve hillside areas and significant ridgelines, conserve biological resources and water quality, provide opportunities for recreation, and make more efficient use of existing urban infrastructure in the core areas.” The proposed Project does not preclude or interfere with the preservation of such an open space green belt and is consistent with the Generalized Land Use Map, Exhibit L-2. No further response to this comment is needed.

RESPONSE TO COMMENT I-3.

Comment acknowledged. The grading schedule has been revised. At the time of the Draft EIR, the original projected construction schedule included a grading schedule to commence in November 2015. Subject to Project approval and issuance of grading and construction permits, Project construction is conceptually anticipated to commence in September 2016. The text will be modified to reflect the updated data, as shown in Chapter 3, *Corrections and Additions to the Draft EIR*, of this Final EIR. This modified grading schedule does not affect any of the EIR’s conclusions concerning the impacts associated with the grading schedule. Further, at the time of preparation of the Draft EIR, the Los Angeles County General Plan 2035 was still in draft form. The General Plan was subsequently adopted by the Los Angeles County Board of Supervisors on October 6, 2015. The text will be modified to reflect that the General Plan is no longer a “draft”, but “adopted”, as shown in Chapter 3, *Corrections and Additions to the Draft EIR*, of this Final EIR. This modification of text does not affect any of the EIR’s conclusions concerning the Project’s impacts on the recently-adopted General Plan.

RESPONSE TO COMMENT I-4.

The commenter states that because several approved Santa Clarita Valley area projects have not yet been constructed, the Draft EIR cumulative impact analysis is incomplete. The County has developed a list of past, present and probable future projects. Future land development is anticipated for the Santa Clarita Valley as quantified in the Santa Clarita Valley Consolidated Traffic Model (SCVCTM). The SCVCTM includes a land use database prepared by the County and the City of Santa Clarita that is based on the approved General Plans of each jurisdiction (County Santa Clarita Valley Area Plan and the City of Santa Clarita General Plan). This database is regularly updated as specific projects are proposed and thus is a comprehensive listing of cumulative projects. This long-range land use database includes all previously approved and currently proposed projects for the entire Santa Clarita Valley, including those projects listed in Comment H-4 (see

next paragraph). In addition, the land use database has been updated based on the “One Valley, One Vision” Plan. Please refer to Section 3.0, *Basis for Cumulative Analysis*, Table 3-1, *Related Projects List*, and Figure 3-1, *Related Projects Location Map*. The traffic impact analysis utilizes traffic forecasts based on future land development for long-range cumulative conditions, as discussed in Section 2.2.2 of the traffic study (Appendix K of the Draft EIR).

The commenter mentions several approved but unbuilt housing projects have not been disclosed, such as Tesoro del Valle, West Creek, Tick Canyon, Spring Canyon, and the Keystone project. All of these projects are located within the project vicinity but not close enough⁴ to substantially contribute to the traffic study intersections for the Aidlin Hills Project and thus would not contribute meaningfully to the study intersections. Further, the traffic analysis considers ambient traffic growth and traffic growth attributable to the identified related projects anticipated to occur under the Project’s buildout date (2017) and the buildout year for related project (2034). As such, the unbuilt projects are accounted for within the ambient growth factor. Additionally, the first phase of the Tesoro del Valle project has been constructed for more than a decade, meaning its impacts, if such impacts have an influence on the Project, are accounted for in the EIR’s environmental baseline. Future phases have pending applications for modification to the approved design. West Creek is mostly built out, and thus also is accounted for in the EIR baseline, and the Keystone project is under construction. Only the Tick Canyon and Spring Canyon projects have yet to be implemented, and these projects are the furthest from the Aidlin Hills Project site, being in the Canyon Country area far to the east. Specifically, Tick Canyon and Spring Canyon are located approximately 12.5 miles east and 14 miles east of the Project site, respectively.

In regards to water supply, according to the 2010 Urban Water Management Plan (“UWMP”), Final, for the CLWA, CLWA Santa Clarita Water Division, Newhall County Water District, and Valencia Water Company, and confirmed by the 2014 Santa Clarita Valley Water Report,⁵ the CLWA and the retail purveyors have adequate supplies to meet CLWA service area demands, which includes the Project and the approved projects, during normal, single-dry, and multiple-dry years throughout the 40-year planning period. All of the projects referenced above are accommodated in the 2010 UWMP. The population of the CLWA service area was projected for the years 2010 to 2050 using a persons-per-household (PPHH) growth factor. The Adopted Los Angeles County General Plan 2035 plans for the physical development of the County through year 2035, which includes planning for public services and infrastructure. Further, as discussed above, the SCVCTM takes into account future projects, future traffic volume growth projections, roadway networks, infrastructure and buildout of the General Plan.

RESPONSE TO COMMENT I-5.

The commenter states that the Project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ). The Draft EIR acknowledges the site location within the VHFHSZ; please refer to Section 2.0, *Project Description*, page 2-1 and 2-2, Section 4.11, *Public Services*, page 4.11-12, and Section 4.7, *Hazards and Hazardous Materials*, page 4.7-31 and 4.7-32, of the Draft EIR. As discussed therein, the Project proponent

⁴ *The County of Los Angeles, Department of Public Works “Traffic Impact Analysis Report Guidelines,” January 1, 1997, requires a list of related projects “that are approximately within a one-and-a-half mile radius” of the project site.*

⁵ *2014 Santa Clarita Valley Water Report for Castaic Lake Water Agency, CLWA Santa Clarita Water Division, Los Angeles County Waterworks District 36, Newhall County Water District, and Valencia Water Company, prepared by Luhdorff & Scalmanini Consulting Engineers, dated June 2015, <http://www.ncwd.org/wordpress/wp-content/uploads/2015/07/2014-Santa-Clarita-Valley-Water-Report.pdf>.*

proposes an emergency secondary fire access road to the east, connecting with Verandah Court, which would be maintained to provide emergency fire access through the roadway infrastructure of the private properties southeast of the Project site. No further response in this regard is warranted.

The commenter states that Project mitigation includes stucco sides on houses. Project mitigation does not specifically call out stucco sides on houses. Section 2.0, *Project Description*, of the Draft EIR, Objective 12, is to incorporate multiple fire protection measures to safeguard the Project and the existing adjacent residential community from wildfire hazards. As discussed on pages 4.7-29 through 4.7-33, in Section 4.7, *Hazards and Hazardous Materials*, of the Draft EIR, the fire protection measures proposed by the Project include a fuel modification plan, which would incorporate a landscape plan that utilizes a plant palette consisting of fire retardant plants and native and appropriate non-native drought tolerant species in accordance with the LACFD guidelines; an emergency vehicle access road; two 250,000-gallon water storage tanks, one booster station, two pressure regulating stations, and a 12-inch pipeline within Pico Canyon with a secondary point of connection at Verandah Court; and overall compliance with the Los Angeles County Building and Fire Code along with all applicable department regulations and standards. Mitigation Measure 4.7-3 requires the Permittee to fund any necessary upgrades to the surrounding water infrastructure to meet fire flow requirements, with the Valencia Water Company designing and constructing the necessary upgrades at the Permittee's expense. As concluded in Section 4.7, *Hazards and Hazardous Materials*, of the Draft EIR, compliance with applicable regulatory requirements and implementation of the PDFs and prescribed mitigation measure would reduce impacts regarding wildland fires to a less than significant level. As such, no further response in this regard is warranted.

The commenter raises concerns in regards to costly fire insurance. This comment does not raise any specific environmental concerns or issues regarding the Draft EIR. As such, no further response in this regard is warranted.

The commenter requests the County to provide a cost of services study for the Project and to begin generating fees to ensure that adequate financing of fire services can be provided. This comment does not raise any specific environmental concerns or issues regarding the Draft EIR. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT I-6.

This comment references the current lack of sewage facilities accessing the Project site. This is acknowledged, since the property is not currently developed. Please refer to Section 6.0, *Other Mandatory CEQA Consideration*, page 6-20, of the Draft EIR, which provides an analysis for wastewater/sewer. As discussed therein, the Project would connect with existing water and sewer lines along Pico Canyon Road that currently serve the single-family residential community directly to east. The Project proponent proposes two 250,000-gallon water storage tanks, one booster station, two pressure regulating stations, and a 12-inch pipeline in Pico Canyon Road with a secondary point of connection at Verandah Court. The Sanitation Districts have Trunk Sewer lines in Orchard Village Road at Mill Valley Road (Valencia, 24-inch), and in a private right of way southeast of the intersection of Orchard Village Road and Wiley Canyon Road (District No. 32 Main, Section 2, 18-inch), both approximately 3.5 miles to the east. The Project is located outside the boundaries of the Santa Clara Valley Sanitation District and would require annexation into the District before sewage service can be provided. The Sewer Area Study, Appendix L of this EIR, proposes that the Project sewer flows would connect to the existing 15" VCP sewer pipe just downstream of the Project site in Pico Canyon Road, which has been determined by the County to adequately service the Project. The

necessary improvements would be verified through the permit approval process of obtaining a sewer capacity and connection permit from the Sanitation Districts. This is the conclusion corroborated in the April 2014, Sewer Area Study, Stevenson Ranch, TM No. 52796, Santa Clarita, CA prepared by Alliance Land Planning & Engineering, Inc. No further response in this regard is warranted.

RESPONSE TO COMMENT I-7.

This comment raises concerns regarding the adequacy of the water supply for the Project and erroneously states that the Project Initial Study concluded that there would be no impact to water supply. Please refer to Section 6.0, *Other Mandatory CEQA Consideration*, pages 6-21 and 6-22, of the Draft EIR, which provides an analysis of the Project's water supply. The Initial Study (Appendix A of the Draft EIR, Page 51) clearly concludes that there would be a less than significant impact on water supply. As discussed therein, and concluded in the 2010 UWMP and confirmed by the 2014 Santa Clarita Valley Water Report, the Castaic Lake Water Agency ("CLWA") and the retail purveyors have adequate supplies to meet CLWA service area demands, which includes the Project, during normal, single-dry, and multiple-dry years throughout the 40-year planning period. Implementation of the Project, including landscaped slopes and common areas, would result in an estimated water average daily demand ("ADD") of 91,800 gpd and maximum daily demand ("MDD") of 212,058 gpd.⁶ Compliance with water conservation measures such as those required by Titles 20 and 24 of the California Administrative Code would help to reduce the Project's water demand. Construction of the Project would include all necessary on- and off-site water infrastructure improvements and connections to adequately connect to the County's existing water system. As the Project would not consist of 500 or more dwelling units, the Project is not subject to Senate Bill ("SB") 610, which requires that a water supply assessment be conducted by the water service provider to determine if there is sufficient water supply to serve the Project during normal, single dry, and multiple dry water years. According to the Valencia Water Company, there is adequate water supply for the Project. The Project Permittee would be required to comply with whatever regulations are in place with the water supplier at the time of project implementation, including the State Water Resources Control Board's formal emergency regulatory package for implementing the state's required 25% reduction in urban water use. Further, the Project proponent shall pay the appropriate facility capacity fee required by the CLWA.⁷ As concluded in Section 6.0, *Other Mandatory CEQA Considerations*, sufficient water supplies would be available to serve the Project from existing entitlements and resources, and new or expanded entitlements would not be necessary. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT I-8.

The commenter states the Project appears to be outside of the service territory of both the CLWA and Valencia Water Company. As discussed in Section 6.0, *Other Mandatory CEQA Consideration*, pages 6-21 and 6-22, and per correspondence with the CLWA (Comment Letter F above) and Valencia Water Company (water availability letter dated August 15, 2014 and valid for two years), the CLWA is the wholesale water supplier to the Valencia Water Company, and all but the proposed water tank location are contained within the CLWA service area. As such, no further response in this regard is warranted.

⁶ Cris Perez, Valencia Water Company, Email Correspondence, dated July 1, 2014,

⁷ Cris Perez, Valencia Water Company, Email Correspondence, dated July 1, 2014.

As discussed in Section 6.0, *Other Mandatory CEQA Consideration*, pages 6-1 and 6-2, the Project is located outside the boundaries of the Santa Clarita Valley Sanitation District and would require annexation into the District before sewage service can be provided. The necessary improvements would be verified through the permit approval process of obtaining a sewer capacity and connection permit from the Sanitation Districts subsequent to annexation. Per the coordination with the Valencia Water Company, the proposed water demand of the Project would be met by the current water supply. Further, as discussed therein, implementation of the Project, including landscaped slopes and common areas, would result in an estimated water average daily demand (“ADD”) of 91,800 gpd and maximum daily demand (“MDD”) of 212,058 gpd.⁸ For the Project’s proposed ADD and MDD, this represents approximately 0.10 percent and 0.22 percent, respectively of the interpolated projected average/normal year water supply of 108,027 afy⁹ in 2017 (the year that Project operations would begin); approximately 0.09 percent and 0.20 percent, respectively, of the interpolated projected single-dry year water supply of 120,605 afy¹⁰ in 2017; and approximately 0.08 percent and 0.19 percent, respectively, of the interpolated projected multiple-dry year water supply of 128,411 afy¹¹ in 2017.¹² As such, the conclusions of Draft EIR would not change; impacts related to water supply would be less than significant.

RESPONSE TO COMMENT I-9.

The commenter claims that water supply impacts from the Project cannot be known because of the lack of a water supply assessment. Please refer to Response to Comment I-7 and Response to Comment I-8 above. Response to Comment H7 explains why a water supply assessment is not required. The conclusions remain the same within the Draft EIR: impacts related to water supply would be less than significant. Therefore, recirculation of the Draft EIR would not be necessary.

RESPONSE TO COMMENT I-10.

The commenter does not understand why elementary students from the proposed Project would not be able to attend Pico Canyon Elementary School. As discussed in Section 4.11, *Public Services*, page 4.11-14, Pico Canyon Elementary School has a total elementary student enrollment of 961, exceeding the total elementary student capacity of 850. Pico Canyon Elementary School has no room for expansion of school buildings or portable classrooms, as is stated in the Newhall School District (NSD) September 16, 2014 NOP Comment letter (Appendix A of the Draft EIR). Further, there are no plans for expansion of facilities on school property.¹³ Due to the cap on school enrollment, additional elementary school children are diverted and assigned to other elementary schools within the NSD. According to the NSD, other schools with available capacity are not located within the vicinity of the Project site and the NSD does not offer bus services for this

⁸ *Cris Perez, Valencia Water Company, Email Correspondence, dated July 1, 2014,*

⁹ *Average/Normal Year 2020 (110,157 afy) – Year 2015 (106,607 afy) = 3,550 afy/5 years = 710 afy/year. Year 2015 (106,607 afy) + Year 2016 (710 afy) + Year 2017 (710 afy) = 108,027 afy in Year 2017.*

¹⁰ *Single-Dry Year 2020 (126,887 afy) – Year 2015 (116,417 afy) = 10,470/5 years = 2,094 afy/5 years. Year 2015 (116,417 afy) + Year 2016 (2,094 afy) + Year 2017 (2,094 afy) = 120,605 afy in Year 2017.*

¹¹ *Multiple-Dry Year 2020 (134,252 afy) – Year 2015 (124,517 afy) = 9,735 afy/5 years = 1,947 afy. Year 2015 (124,517 afy) + Year 2016 (1,947 afy) + Year 2017 (1,947 afy) = 128,411 afy in Year 2017.*

¹² *2010 Urban Water Management Plan (Final) for CLWA, CLWA Santa Clarita Water Division, Newhall County Water District, and Valencia Water Company, Table 6-2, Projected Average/Normal Year Supplies and Demands, Table 6-3, Projected Single-Dry Year Supplies and Demands, Table 6-4, Projected Multiple-Dry Year Supplies and Demands, prepared by Kennedy/Jenks Consultants, Luhdorff & Scalmanini Consulting Engineers, and Stacy Miller Public Affairs, dated June 2011.*

¹³ *Ronna Wolcott, Assistant Superintendent, Business Services, Newhall School District, Letter Correspondence, April 20, 2014.*

situation.¹⁴ However, there are six NSD elementary schools within approximately three miles of the Project site: (1) Stevenson Ranch Elementary School, 25820 North Carroll Lane, Stevenson Ranch, located approximately 0.8 miles north of the Project site; (2) Oak Hills Elementary School, 26730 Old Rock Road, Valencia, located approximately 1.75 miles north of the Project site; (3) Wiley Canyon Elementary School, 24240 West La Glorita Circle, Newhall, located approximately two miles east of the Project site; (4) Meadows Elementary School, 25577 North Fedala Road, Valencia, located approximately 2.5 miles northeast of the Project site; (5) Old Orchard Elementary School, 25141 North Avenida Rondel, located approximately 2.7 miles east of the Project site; and (6) Peachland Elementary School, 24800 Peachland Avenue, Newhall, located approximately 2.85 miles east of the Project site.

The traffic analysis complies with the Los Angeles County DPW's established guidelines for the analysis of traffic impacts based on the Project opening year and cumulative conditions (which includes longer school commutes from the Project to the middle and high schools). According to Section 4.12, *Traffic/Transportation*, page 4.12-4, traffic count data was collected throughout the study area during the critical A.M. and P.M. peak hours on various dates in February, March, and April 2014. The data was collected while local schools were in session (including school drop off and pick up). Modeling conducted in Section 4.2, *Air Quality* and Section 4.6, *Greenhouse Gas Emissions*, were based on traffic modeling inputs/traffic count data within Section 4.12, *Traffic/Transportation*. As such, no further response in this regard is warranted.

The commenter states school traffic creates a public safety issue and that it would complicate any evacuations necessitated by a fire or other emergency. Please refer to Section 4.11, *Public Services*, page 4.11-12, Section 4.7, *Hazards and Hazardous Materials*, page 4.7-31 and 4.7-32, and Section 4.12, *Traffic/Transportation*, of the Draft EIR, for an analysis of fire hazard and emergency access. As discussed therein, the Project proposes an emergency secondary fire access road to the east, connecting with Verandah Court, which would be maintained to provide emergency fire access through the roadway infrastructure southeast of the Project site. The Project site would be designed to provide access to fire, ambulance, and police vehicles from adjacent roadways. Clear and uninterrupted access into the site for emergency response vehicles would be served from Pico Canyon Road. The Project's access drives and internal private drives would be designed to meet the County and LACFD standards. All site access and circulation would be reviewed by the Los Angeles County DPW and LACFD to ensure that the Project provides adequate emergency access. As concluded in Section 4.12, *Traffic/Transportation*, the functionality of the street system would remain and there would be available capacity to accommodate the projected traffic volumes, in addition to emergency vehicles. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT I-11.

The commenter states that mitigation should be included for biological impacts caused by the Project fuel modification. The commenter also understands that Project mitigation would build wetlands for amphibians but it is not explained where these wetlands would be created. The commenter erroneously states that biological surveys for sensitive species were not conducted along the blue-line streams. Lastly, the commenter suggested that a blue-line stream avoidance alternative would be preferred.

¹⁴ *Ibid.*

The discussion of impacts to biological resources is contained in **Section 4.3**, Biological Resources of the Draft EIR. Fuel modification impacts to biological resources are thoroughly analyzed in Section 4.3; please refer to Table 4.3-2, *Impacts to Plant Communities* (Page 4.3-38), in which is summarized the impacts to plant communities resulting from fuel modification implementation. Mitigation Measure 4.3-3 (Page 4.3-34) addresses potential impacts to western spadefoot, a Species of Special Concern that was not observed during site surveys but has the potential to occur if seasonal pools of water form. Formal wetlands are not proposed to be created with this mitigation, but carefully designed seasonal pools for suitable breeding habitat would be created under guidance from the California Department of Fish and Wildlife (CDFW).

Recent field surveys were conducted in March and June 2014. Prior to the recent surveys, earlier surveys were conducted in 2000 and 2005. Surveys for sensitive species were conducted over the entire Project site, including the blue-line stream of Wickham Canyon. Please see Figure 4.3-2, *Sensitive Plant Locations*, as evidence that such surveys were completed.

RESPONSE TO COMMENT I-12.

The commenter concurs with the Santa Monica Mountains Conservancy comment that biological mitigation measures only give animals warning prior to habitat destruction (Comment C-5 above). Please refer to Response to Comment C-5.

RESPONSE TO COMMENT I-13.

Comment acknowledged. Please refer to Response to Comment I-1 regarding the County's public process, Response to Comment H-2 regarding the Project application not needing a plan amendment, and Response to Comment H-4 regarding the cumulative impact analysis. As this information was previously provided in the Draft EIR, and the conclusions remain the same, recirculation of the Draft EIR would not be necessary. For an analysis on USGS blue-line streams, please refer to Section 4.3, *Biological Resources*, of the Draft EIR. As described therein, with incorporation of Project design features and the implementation of mitigation measures, impacts associated with biological resources would be reduced to a less than significant level. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT I-14.

The commenter expresses opposition to incursions into fire hazard areas because of the cost to defend future residents from fires. Please refer to Response to Comment I-5 above regarding the Project location within a VHFHSZ. The comment regarding a cost analysis for firefighting purposes does not raise any specific environmental concerns or issues regarding the Draft EIR. As such, no further response in this regard is warranted.



Letter J

Santa Clarita Group
26920 Monterey Ave.
Santa Clarita, CA 91355

1-20-16

Tyler Montgomery
Department of Regional Planning, County of Los Angeles
Land Division Section Rm 1382
320 W. Temple Street
Los Angeles, CA 90012

Via Email to: tmontgomery@planning.lacounty.gov

Re: Comments on the EIR for the Aidlin Project No. 00136(5), and associated permits

Dear Tyler Montgomery:

As both residents of the Santa Clarita Valley and members of the Sierra Club, we are concerned about the ramifications of the “Aidlin Project” in Pico Canyon.

First, we oppose the proposed zone change required for this project. It does not meet the burden of proof required for such a change since there are thousands of already approved but unbuilt units in the Santa Clarita Valley. There is no need for a project like this in a high fire hazard area where substantial public funds will be required to extend water and sewer services. The General Plan update for 2012 also promised our community a green belt around the Valley and that additional growth would be focused on infill. It seems to us that a Plan Amendment would be required for this proposal. Please explain why it is not being required.

The DEIR seems to make several statements that are out of date and should be corrected for accuracy. It describes a grading schedule which will begin in Nov., 2015 (already out of date since this is Jan 2016 and the project has yet to receive several approvals), and a “draft” Los Angeles County General Plan, which in fact was approved in 2015. (p.4.1-2)

With all the already approved but unbuilt units in the Santa Clarita Valley, we do not need additional urban sprawl housing. While some projects are listed on page 3-2 of the DEIR, many already approved but unbuilt housing projects have not been disclosed, such as Tesoro del Valle, West Creek and the Keystone project. This failure to disclose affects the decision makers’ ability to judge whether the burden of proof presented in the approval is accurate and will lead to a false assessment of infrastructure needs, and invalidates the cumulative analysis. Please identify all housing that is approved but unbuilt in the SCV and discuss how the County will meet any burden of proof required to approve this additional unneeded housing. Please include this housing in the cumulative analysis section.

1

2

3

• Fire Hazard

“The Fire Department designates land in the County in regard to its potential for wildland fire hazards. These designations are made by the County Forester, and are based on multiple criteria, including the following primary characteristics: (1) an area’s accessibility, (2) water availability/lack of adequate water supplies, (3) amount and type of vegetative cover, and (4) topography. The Project site is located within Fire Zone 4, which is a VHFHSZ (VERY HIGH FIRE HAZARD ZONE)” (DIER Page 4.7-20)



While the fire hazard section describes several mitigation measures such as stucco sides on houses, this will not project homes in this area when faced with a wildfire under high wind conditions as regularly occur in this area. We therefore oppose approval of this project when there is only one road out and in. It creates a dangerous condition for future residents and makes it hard for fire trucks to access the area.

4

We disagree with the absurd statement made on this same page “A VHFHSZ typically has the following vegetative types or is adjacent to such communities: chaparral, coastal sage, annual grasslands, riparian, and oak woodlands. Wildland fires are relatively common occurrences in these plant communities, which are found in the Santa Clarita Valley and surrounding area. **These plant communities pose a threat to expanding urban development due to their high combustibility and their dense biomass.**” In fact it is not these often rare and much treasured plant communities that threaten urban development, it is the other way around. Urban development should not be approved in these locations.

• Oil Wells

The DEIR briefly describes some “apparently plugged/abandoned oil wells occur along the unimproved road in the northern and central portions of the site, respectively”. (4.7-17) How will the old oil wells in this project be mitigated and their impacts be minimized to protect future residents and the wildlife that inhabit the area? A well location map along with closure reports and soil testing should be included in the DEIR.

5

• Sewage Treatment/Water

The DEIR must clearly indicate potential negative water quality impacts on the Santa Clara River. For example, chloride is already a significant problem. This project will make it worse by adding additional residents and requiring the need for additional state water supply that is high in chlorides. How will these problems be mitigated?

6

• Water Supply

The entirety of the water supply analysis seems to be one paragraph that includes an estimate of how much water will be used without any disclosure as to how this figure was derived. It includes the sentence “According to the Valencia Water Company, there is adequate water supply for the Project.” (pg. 6-22) which is apparently based on an email. The DEIR fails to

7

disclose that this project is not currently in the Valencia Water Company Service area and would have to be annexed in, relying on an email to show adequacy of water supply is not acceptable. Since no Water Supply Assessment was required or supplied, one cannot know the current impacts or cumulative impact of this project in light of the Drought emergency. This is wholly and completely inadequate. An adequate water section should be provided and the DEIR re-circulated to interested parties.

7
(cont.)

- Traffic

The traffic patterns created during school drop off and pick up at Pico Elementary seem to have not been considered. Since children from this project will not be able to attend Pico Elementary and will be making long commutes to the Junior High and High School, these trips must be included in the Traffic, GH Gas and air quality sections.

Since this project has only one road, traffic in a fire evacuation emergency should have been provided. We believe the road infrastructure for this project is unsafe for a high fire hazard area.

8

Realistic assumptions must be used in the application of the traffic model. In the past rosy scenarios have resulted in traffic models that minimize the true impact of previous projects, many of which were not even disclosed in the cumulative analysis. Assumptions about the number of trips between the project and local industrial parks need to be made by assuming that many new trips will be generated both in and out of the San Fernando Valley. Again, cumulative impacts are important and must be fully and accurately considered.

- Geology

After the Northridge earthquake the state mapped photographically the Santa Susanna Mountains. They concluded that there should never be any building in those mountains due to the number of landslides they had discovered. This sits on Santa Susanna geology. This must be taken into account in the EIR. Another problem is that there will be a lot of cut and fill on this project. There needs to be a guarantee that homes built on fill or cut and fill will not suffer serious structural damage in an earthquake. Cut and fill lots should be disclosed to future home owners.

9

- Biology

This project will affect several sensitive plants and animals. In spite of this the DEIR seems to depend on only two recent surveys taken in 2014 to compile the biological data. Surveys cannot be just taken arbitrarily. They must be taken during breeding or flowering season, or within a certain temperature range, etc to accurately locate the presence of various flora and fauna. It is hard to understand how this could have occurred with only two survey dates.

10

All of the biological mitigation measures offer no permanent or adequately defined mitigation value. Developing future mitigation measures or stating that for instance, spade foot toads will be moved to created wetlands that are not identified in the DEIR, does not provide sufficient disclosure to the public, far less, sufficient protection for the species.

The biological mitigation measures only address giving animals in the development footprint some warning before their habitat is destroyed, or they represent deferred mitigation with undefined mitigation sites and performance criteria. The DEIR biological mitigation measures are inadequate to compensate for the loss of 66 acres of habitat in the Santa Clarita Woodlands area. The protection of the open space is valuable but, it does not offset the direct permanent impacts to at least 66 acres of habitat.

10
(cont.)

• Air Quality

Another serious concern with this project is the substantial effect the proposed development would have on the worsening air quality that we have in our area. Again, the cumulative analysis did not include several nearby projects as previously stated, so the analysis of cumulative air pollutant emissions in the area cannot be valid. Given the existing air-quality in the Santa Clarita Valley the added pollution from this project is unmitigatable. Cumulative impacts must be analyzed. The SCV already exceeds Federal air pollution standards for particulate matter generated from dust and diesel pollution.

11

In addition, there would be long-term effects resulting from the additional traffic on our local roads and freeways. Climatologists agree that greenhouse gases are causing global warming and even the Supreme Court, in its decision several months ago, said that EPA must address Carbon Dioxide as a pollutant. The project should not be approved without making extensive/green public transportation available to its future residents.

• Green Building Standards

The Sierra Club appreciates the County’s work to approve a Low Impact Development Ordinance and Storm Water Ordinance and Landscape Ordinance. We request that the County ensure that this project complies in full with these ordinances and that any new green building standards be included as conditions of any approval that might be considered.

12

CONCLUSION

This project is in a wildland area with many rare plants and animals and it will affect wild life corridors. It does not provide sufficient ingress and egress for public safety even though it is located in a high fire hazard area. The transportation section fails to describe the traffic problem that will be created because the children of future residents will not be able to attend the local elementary school and will have to commute by car to all schools. There is no plan to address these problems.

13

The DEIR fails to include many approved but unbuilt projects located in the SCV in its cumulative analysis projects in its cumulative analysis and the water supply section is totally inadequate.

14

We therefore ask that the Regional Planning Department require the developer to provide an adequate disclosure of these issues and re-circulate the document when this information is provided.

14
(cont.)

We thank you in advance for your attention to our concerns.

Sincerely,

David Morrow

David Morrow, M.D.
Chairman, Santa Clarita Group

2.12 RESPONSE TO LETTER J

SIERRA CLUB

David Morrow, M.D., Chairman, Santa Clarita Group

26920 Monterey Avenue

Santa Clarita, CA 91355

RESPONSE TO COMMENT J-1.

The commenter expresses concerns about the Aidlin Hills project and the opposition to a zone change. The Project does not require a zone change, and no application requesting a zone change is being processed. Similarly, the Project does not require a plan amendment. For explanation of why a plan amendment is not required, please see Response to Comment H2 above.

RESPONSE TO COMMENT J-2.

Comment regarding out-of-date information in the Draft EIR is acknowledged. Please refer to Response to Comment I-3 above.

RESPONSE TO COMMENT J-3.

Comment concerning cumulative impacts and approved but unbuilt projects is acknowledged. Please refer to Response to Comment I-4 above.

RESPONSE TO COMMENT J-4.

The commenter states mitigation such as stucco sides on houses would not protect homes in the Project area when faced with a wildfire under high wind conditions. The commenter opposes approval of the Project when there is only one road out and in as it creates a dangerous condition for future residents and makes it difficult for fire truck access. Project mitigation does not specifically call out stucco sides on houses. Section 2.0, *Project Description*, of the Draft EIR, Objective 12, is to incorporate multiple fire protection measures to safeguard the Project and the existing adjacent residential community from wildfire hazards. As discussed on pages 4.7-29 through 4.7-33, in Section 4.7, *Hazards and Hazardous Materials*, of the Draft EIR, the fire protection measures proposed by the Project include a fuel modification plan, which would incorporate a landscape plan that utilizes a plant palette consisting of fire retardant plants and native and appropriate non-native drought tolerant species in accordance with the LACFD guidelines; an emergency secondary fire access road to the east, connecting with Verandah Court, which would be maintained to provide emergency fire access through the roadway infrastructure of the private properties southeast of the Project site; two 250,000-gallon water storage tanks, one booster station, two pressure regulating stations, and a 12-inch pipeline within Pico Canyon with a secondary point of connection at Verandah Court; and overall compliance with the Los Angeles County Building and Fire Code along with all applicable department regulations and standards. Mitigation Measure 4.7-3 requires the Permittee to fund any necessary upgrades to the surrounding water infrastructure to meet fire flow requirements, with the Valencia Water Company designing and constructing the necessary upgrades at the Permittee's expense. As concluded in Section 4.7, *Hazards and Hazardous Materials*, of the Draft EIR, compliance with applicable regulatory requirements and implementation of the PDFs and prescribed mitigation measure would reduce impacts regarding wildland fires to a less than significant level.

The commenter states that urban development is a threat to the plant communities located within the VHFHSZ. It is acknowledged that urban development in undeveloped areas such as the proposed Project would impact plant communities as a consequence of both the new development and associated fuel modification. The LACFD considers the flammable characteristic of native vegetation to be potentially dangerous for public safety when located in proximity to residential uses.¹⁵ In such VHFHSZ areas, the LACFD requires the implementation of fuel modification in order to provide defensible space around residential structures. Fuel modification implementation would impact plant communities by the removal or thinning vegetation. The potential impacts to biological resources in regards to protecting the residential structures of the Project from fire hazards were taken into consideration in assessing overall Project impacts to biological resources. Please refer to Section 4.3, *Biological Resources*, of the Draft EIR, for an analysis of impacts to biological resources. No further response in this regard is warranted. Please refer to Response to Comment I-5 above.

RESPONSE TO COMMENT I-5.

This comment refers to oil wells occurring within the Project site. Please refer to Section 4.7, *Hazards and Hazardous Materials*, page 4.7-33, of the Draft EIR, for oil well features and their corresponding Project design features (PDF 7-1 through PDF 7-5) and page 4.7-26, for mitigation measures pertaining to oil (Mitigation Measures 4.7-1). Also refer to Appendix G, Phase 1 Environmental Site Assessment/Subsurface Investigation, of the Draft EIR, for a well location map with closure reports and soil testing. No further response in this regard is warranted.

RESPONSE TO COMMENT I-6.

This comment expresses concern about water quality and the Project's potential impact on the Santa Clara River. Please refer to Section 4.8, *Hydrology and Water Quality*, page 4.8-23 and 4.8-24, of the Draft EIR, which states that--given the proposed residential uses for the Project--Chloride, Chlorpyrifos, Coliform, and Diazinon, the constituents for which the Santa Clara River is listed as impaired (and which are generally associated with agricultural uses), is not expected. Implementation of BMPs and NPDES requirements, as well as implementation of LID requirements, would ensure the impact of storm water runoff leaving the Project area would be less than significant. No further response in this regard is warranted.

RESPONSE TO COMMENT I-7.

The comment regarding the adequacy of water supply is acknowledged. Please refer to Response to Comment I-7 regarding water supply impacts, Response to Comment H-8 regarding CLWA service area, and Responses to Comment H-9 above regarding the need for a water supply assessment.

RESPONSE TO COMMENT I-8.

The comment regarding traffic and school safety is acknowledged. Please refer to Response to Comment I-10 above.

¹⁵ County of Los Angeles, Fire Department. 2011. *Fuel Modification Plan Guidelines: A Firewise Landscape Guide for Creating and Maintaining Defensible Space*.

RESPONSE TO COMMENT I-9.

The commenter expresses concern regarding geotechnical safety for the Project. A Geotechnical Evaluation and 100-Scale Plan Review, included in Appendix E, of the Draft EIR, provides information and findings of the Project site and Project vicinity. According to Section 4.5, *Geology and Soils*, page 4.5-24 and 4.5-25, of the Draft EIR, the proposed cut slopes and fill slopes would be stable if graded in accordance with the Geotechnical Evaluation and the 100-Scale Plan Review recommendations. The natural slopes would be grossly stable if the adjacent grading is confined to the proposed grading limits and does not undercut natural slopes outside of the grading limits. The standard setbacks from grossly stable ascending and descending natural slopes provided in the County's Building Code shall also be followed, where not superseded by the recommended building setbacks. As concluded therein, compliance with applicable regulatory requirements and incorporation of the Geotechnical Evaluation and the 100-Scale Plan Review recommendations and Project design features would ensure geology and soils impacts are less than significant. No further response is required.

The suggested guarantee to homeowners that homes built on fill would not suffer serious structural damage in an earthquake is neither realistic nor required by the State CEQA Guidelines. However, the Project would be constructed according to all applicable building standards required for seismic safety. The County Building Code for Structural Design, Section 1613, Earthquake Loads, establishes minimum regulations for the design and construction of new buildings when such buildings are to be located on steep slopes and also establishes minimum standards for seismic force resistance to reduce the risk of injury or loss of life in the event of earthquakes. Compliance with these building standards would minimize the potential for structural damage for any homes built on fill and no further response in this regard is warranted.

Disclosing cut and fill lots to future homeowners is not required by the State CEQA Guidelines. However, the Project environmental documents and grading plans, which disclose the cut and fill modifications to the project topography, are public record and any future homeowner may reference these documents prior to purchase. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT I-10.

The commenter states that wildlife surveys were not conducted at the proper time of year and that the proposed mitigation measures provide no permanent mitigation value. Please see Response to Comment H-11 above. The precise location for any proposed western spadefoot seasonal pools cannot be specified at this time because such seasonal pools were not observed on the Project site, and western spadefoot has not been observed on the Project site. If mitigation for the creation of seasonal pools is required, consultation with CDFW would be required in selecting suitable breeding habitat for this species.

RESPONSE TO COMMENT I-11.

The commenter raises concerns with the air quality and greenhouse gas emission analyses within the Draft EIR that pertain to the cumulative analysis, existing particulate matter exceedances, and long-term vehicle emissions. Section 3.0, *Basis for Cumulative Analysis*, of the Draft EIR analyzes the cumulative impact of the Project; Section 4.2, *Air Quality*, of the Draft EIR, analyzes the air quality impact; and Section 4.6, *Greenhouse Gas Emissions*, of the Draft EIR, analyzes the greenhouse gas impact.

See Response to Comment H-4 and Response to Comment I-3 for the identification of related projects in the cumulative analysis. Because the related projects suggested by the commenter are a large distance away

from the Project site, the cumulative air quality impacts of closer related projects is a more conservative evaluation, and the analysis remains valid.

As discussed in Section 4.2, *Air Quality*, page 4.2-17, the local air monitoring station for the Santa Clarita Valley has recorded no exceedances of the National standard for PM₁₀ in the past five years and only one or two exceedances per year for PM_{2.5}. The local construction and operational emissions evaluated on page 4.2-38 and 4.2-39 show that PM₁₀ and PM_{2.5} emissions for the Project would be under the corresponding regulatory thresholds. As a result, the Project's development and operation would have a less than significant impact on the local air quality of the Santa Clarita Valley.

As discussed in Section 4.6, *Greenhouse Gas Emissions*, page 4.6-20, the impact of greenhouse gas emissions generated by the Project's vehicle traffic traveling to and from the Project site was evaluated in the analysis. The resulting emissions are quantified in terms of carbon dioxide equivalents on page 4.6-25 and are shown to be less than significant.

RESPONSE TO COMMENT I-12.

Comment acknowledged. The County shall ensure the Project complies with all applicable ordinances and green building standards.

RESPONSE TO COMMENT I-13.

This comment tracks earlier comments on the Draft EIR regarding emergency access for public safety and potential traffic impacts associated with future students not attending the local elementary school. Please refer to Responses to Comments I-3, I-4, I-7 through H-10, and J-4, above.

RESPONSE TO COMMENT I-14.

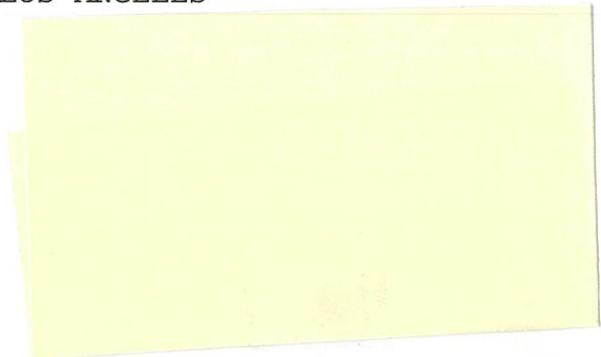
This comment reiterates the earlier concern about adequate cumulative impact analysis expressed in Comment I-3 and Comment H-4 above. Please refer to Response to Comment I-4 above.

Information provided in this volume of the Final EIR clarifies, amplifies, or makes minor modifications to the Draft EIR. No significant changes have been made to the information contained in the Draft EIR as a result of the responses to comments, and no significant new information has been added that would require recirculation of the document. As such, no further response in this regard is warranted.

Letter K

REGIONAL PLANNING COMMISSION HEARING

COUNTY OF LOS ANGELES



Monday, January 11, 2016, 6:10 p.m., at Pico Canyon
Elementary School, 25255 Pico Canyon Road, Stevenson
Ranch, California.

Reported by: Dayna Michelle Glaysher

CSR Number 13079

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APPEARANCES:

Rosie O. Ruiz, Commission Secretary

John Calas, Hearing Examiner

Kim Szalay, Staff

Tyler Montgomery, Staff

Denise Williams, Project Manager, Lennar

Public Speakers:

1. Martin Keegan
2. Manuel Santana

1 Stevenson Ranch, California, Monday, January 11, 2016

2 6:10 p.m. - 6:28 p.m.

3 ***

4

5 MR. CALAS: We'll go ahead and get started.

6 If everyone could please stand and join me in the pledge

7 of allegiance.

8

9 (Pledge of Allegiance)

10

11 Good evening. My name is John Calas. I'm
12 the hearing examiner for the Aidlin Hills residential
13 project. The purpose of this public hearing is twofold.
14 First, it is for local community members to receive a
15 clear understand of the proposed project. And second,
16 to provide the opportunity for local community members
17 to comment on the strengths and weakness of the proposed
18 project as analyzed in the draft environment impact
19 report or draft EIR.

20

21 Before we get started I would like to
22 briefly touch on the hearing procedures. The hearing
23 will begin with a staff presentation, followed by an
24 optional presentation by the applicant. Those who wish
25 to testify during the hearing will need to fill out a
speaker card available at the back of this room. We

1 will call you to come forward when it is your time to
2 testify.

3 At that time please state your name and
4 address and be sure to spell your last name for the
5 benefit of the transcription. Regarding time limits,
6 the applicant will be allowed 15 minutes to present
7 testimony in support of their application and an
8 optional five minute rebuttal following public
9 commentary.

10 All other speakers will be limited to three
11 minutes. All speakers are urged to not repeat testimony
12 presented by others. And speakers may not give time to
13 another speaker. Testimony recorded during the public
14 hearing will be made part of the project's public
15 record. Testimony will be taken of all testifiers
16 wishing to speak, have done so or by 8:00 p.m.,
17 whichever comes first.

18 Written testimony on the draft EIR will
19 continue to be received during the draft EIR public
20 comment period, which ends January 21st, 2016. After
21 the close of the draft EIR public comment period staff
22 will prepare responses to comments received during the
23 comment period and from this hearing on the draft EIR.

24 A final EIR will be prepared for
25 consideration by the Regional Planning Commission along

1 with the request for entitlements. The planning
2 commission public hearing for this project will be held
3 in downtown Los Angeles. Notification for that hearing
4 will be at least 30 days in advance of the hearing date.

5 Additionally, the Planning Commission
6 hearing will be broadcast on the Department of Regional
7 Planning's website for those who may not be able to
8 attend in person. All those who testify tonight will be
9 added to the notification list for the Planning
10 Commission hearing unless otherwise indicated on the
11 speaker card.

12 Will all those planning to testify tonight
13 please stand to be sworn in for public testimony.
14 Nobody? All right. Is anybody planning on speaking
15 tonight?

16 MR. SZALAY: There were two people that went
17 out that were planning to speak.

18 MS. RUIZ: Those are probably them.

19 MR. SZALAY: I have two speaker cards.

20 MR. CALAS: I guess we'll swear them in
21 when they come back in. With that I'm ready for the
22 presentation.

23 MR. MONTGOMERY: Hi. Good evening. My name
24 is Tyler Montgomery with the land division section of
25 the Los Angeles County Department of Regional Planning.

1 And I'll be presenting a brief overview of the Aidlin
2 Hills residential project as analyzed in the draft EIR.
3 My apologies for having to turn my back to you, but I
4 need to make the presentation to my right.

5 So the entitlements requested are vesting
6 tentative tract map No. 52786, conditional use permit
7 No. 00136, Oak tree permit No. 00136, and the
8 environmental assessment No. is also 00136. The project
9 location is a 230 acre site located west of the City of
10 Santa Clarita, approximately 1.6 miles west of the
11 Interstate 5 Highway in the unincorporated community of
12 Stevenson Ranch. The site is accessed from Pico Canyon
13 Road.

14 The existing residential community of
15 Southern Oaks exists immediately to the east, and the
16 Mentryville historic site is located approximately
17 1200 feet to the west. Mentryville is a state historic
18 landmark operated by the Santa Monica Mountains
19 Conservancy. The areas directly to the north and south
20 of the project site are mostly undeveloped with moderate
21 to steep variations in topography.

22 Land use designations, there are 196 acres
23 that are designated hillside management, 30 acres within
24 the urban 2 land use category, and 4.7 acres to the
25 floodplain, floodway land use category. It should be

1 noted that because the project was submitted prior to
2 the adoption of the existing Santa Clarita Valley area
3 plan in 2012, it is being considered under the
4 categories of the previous 1990 area plan.

5 The entire site is zoned A 22, which is
6 heavily agricultural, two acre minimum required lot
7 area. The applicant is seeking an conditional use
8 permit or CUP for a density control development which
9 allows the creation of smaller lots in exchange for the
10 dedication of open space on areas less suitable for
11 building.

12 The project site is primarily vacant and
13 consists of undeveloped terrain, with moderate to steep
14 variations in topography. Several small drainage
15 courses including Wickham Canyon traverse through the
16 site. Vegetation within the project site includes but
17 is not limited to chaparral and coastal sage scrub
18 habitat, riparian habitat, and non-native grassland.

19 Various dirt access roads and trails
20 traverse through this site. The project proposes to
21 create 102 single family residential lots and 13
22 infrastructure lots. A conditional use permit for
23 density controlled development in a hillside area and
24 for grading and seeding 100,000 cubic yards of soil
25 combined of cut and fill materials, and an Oak tree

1 permit for the removal of one Oak tree.

2 The project applicant proposes to develop
3 infrastructure that includes local roadways, two water
4 tanks with a pump station, water quality treatment
5 basins, and an emergency secondary fire access road.
6 The proposed developed and landscaped area would occupy
7 approximately 65 acres.

8 The project applicant also proposes the
9 preservation of approximately 165 acres of undeveloped
10 natural area within the southern and western portions of
11 the project site. The project would require
12 approximately 1,600,000 cubic yards of cut material.

13 The applicant proposes to widen the segment
14 of Pico Canyon Road north of the project site to its
15 approved final width. A 24 foot wide paved emergency
16 vehicle access road connected with Veranda Court to the
17 east would be maintained to provide gated emergency fire
18 access.

19 The slide depicts the existing view of -- on
20 the left of the project site from its access point at
21 Pico Canyon Road, as well as the applicant's photo
22 simulation on the right of the same view as it would
23 appear after the project development and the widening of
24 the road right-of-way.

25 This slide on the left depicts the existing

1 view of the project site from the end of Veranda Court,
2 the street in the Southern Oaks community immediately to
3 the east, as well as the applicant's photo simulation of
4 the same view as it would appear after project
5 development and construction of an emergency fire access
6 road.

7 So the Department of Regional Planning
8 determined an environmental impact report was necessary
9 for the project. The next three slides show 14 areas
10 that were analyzed by the draft EIR.

11 Aesthetics, air quality, biological
12 resources, cultural resources, geology and soils,
13 greenhouse gases, hazards and hazardous materials,
14 hydrology and water quality, land use and planning,
15 noise, public services, which include law enforcement,
16 fire protection, parks and schools, recreation,
17 transportation and traffic, utilities and service
18 systems.

19 Of all the areas analyzed, the draft EIR
20 concluded that with the implementation of specified
21 mitigation measures and project design features the
22 project would create no significant and unavoidable
23 impacts. All other areas of analysis were to determined
24 to have less than significant impacts from the project,
25 assuming that approximately 73 required mitigation

1 measures and project design features would be
2 implemented and monitored by the county's mitigation
3 monitoring and reporting program.

4 The environmental initial study considered
5 that these areas do not require further analysis:
6 Agricultural and forestry, energy, mineral resources,
7 population/housing. So just a background of the
8 project, the community should be aware the original
9 application for vesting tentative tract map, conditional
10 use permit, and Oak tree permit was filed in 2000.

11 A scoping meeting for the current version of
12 the project which gathered public input on potential
13 environmental impact to be analyzed was held in the
14 community in June 2014. The current version of the map
15 was cleared for public hearing, and the current draft
16 EIR was completed in late 2015, and public hearings for
17 project will be held in 2016.

18 So I conclude my presentation by summing up
19 the planning processes that remain for final action to
20 take place on the project. In addition to letters
21 received to date, along with today's testimony, further
22 public and agency comments on the draft EIR will be
23 received till January 21st, 2016, when the public
24 comment period closes.

25 A final EIR containing responses to all

1 public and agency comments will be prepared for the
2 Planning Commission's consideration. Additional written
3 comments on the entitlement request will be received up
4 to the time of the regional Planning Commission hearing
5 to be set at a future date.

6 Additional testimony on the project may also
7 be given at the commission hearing. Any decision made
8 by the Regional Planning Commission may be appealed to
9 the Los Angeles County Board of Supervisors. Any board
10 of supervisors action on the project is final.

11 So these are the different ways you can give
12 public comments: Oral testimony tonight or written
13 comments which are due by January 21. And this is my
14 contact information. So you can write to me, call me or
15 send me an email. And we'll have responses to all of
16 your comments in the final EIR. Thank you.

17 MR. CALAS: Thank you, Mr. Montgomery. So
18 does the applicant have anything that they would like to
19 add to the presentation?

20 MS. WILLIAMS: I think -- I think based on
21 the scope of work that was a wonderful presentation of
22 it.

23 MR. CALAS: Can you please state your name
24 for the record.

25 MS. WILLIAMS: Oh, I'm sorry. Denise

1 Williams, project manager for Lennar.

2 MR. CALAS: Okay. So that being said we can
3 move on to the public testimony portion. Do we have
4 everyone who wants to speak? If we can get everybody to
5 stand so I can swear you in. Okay. Do you and each of
6 you swear or affirm under penalty of perjury that the
7 testimony you may give in this matter now pending before
8 the hearing examiner shall be the truth, the whole
9 truth, and nothing but the truth?

10 MR. KEEGAN: I do.

11 MR. SANTANA: I do.

12 MR. SZALAY: All right. We will begin with
13 the first two speakers that I have here, if they're
14 still present. I know they had left earlier. Marty
15 Keegan.

16 MR. KEEGAN: That's me.

17 MR. SZALAY: And Jesus Henao. Please come
18 forward to the mike up -- there's two chairs there for
19 the two first speakers.

20 MR. KEEGAN: Is this it?

21 MR. CALAS: Yeah. Please have a seat and
22 then just state your name and your address. And if you
23 could spell your last name for the transcription.

24 MR. KEEGAN: Sure. My name is Martin
25 Keegan. My address is 25025 Vermont Drive, Newhall,

1 California 91321. Is there more information? I'm
2 sorry.

3 MR. CALAS: That's it. You have three
4 minutes.

5 MR. KEEGAN: Okay. I'm here tonight because
6 I represent several other owners of property we own up
7 in that area, in fact very close to this site, 14.86
8 acres. They weren't able to be here tonight, but I know
9 they'll be here for the 21st meeting. We have some
10 concerns about water, we have some concerns about issues
11 about runoff. We're also concerned about an easement
12 that's been through that property since 1931. And we
13 have concerns about that.

14 We're going to give all of this to
15 Mr. Montgomery in writing later. But we're also
16 concerned about what's going to happen after the project
17 in as far as police, fire, things that somewhat were
18 addressed up there, but we're going to ask for a lot
19 more explanations of that.

20 We also have concerns basically about just
21 the amount of consumption of water for this project in
22 general. And so we're going to bring that as an issue
23 also. And basically that's it tonight. Give the names
24 of the other owners, if that matters. If it doesn't,
25 then it's fine. We'll present it to you at the time to

1
(cont.)

2

1 Mr. Montgomery.

2 MR. CALAS: Thank you, sir.

3 MR. KEEGAN: Thank you.

4 MR. SZALAY: Santana -- I'm sorry, Manuel
5 Santana.

6 MR. SANTANA: Manny. Everybody calls me
7 Manny.

8 MR. CALAS: Please state your name for the
9 record.

10 MR. SANTANA: Okay. You want me to hit a
11 button?

12 MR. CALAS: No, that's all taken care of.

13 MR. SANTANA: My name is Manny Santana,
14 Manuel Santana for the tax purposes. And I also own a
15 piece of property where Marty Keegan owns up there. The
16 last time we were in a meeting here they talked about
17 providing us an access through open space and I was
18 against that, completely against that. That's not what
19 we wanted.

20 We don't want -- I have open space in
21 another piece of property that we have and it's a pain
22 in the rear. And dogs and people and cutting in front
23 of you and all that time all over the place. And also
24 they provided -- they were talking about putting a
25 bridge from one tract to the other.

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(cont.)

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14

1 Now at that meeting I suggested that you
2 give me the topo map to know where your project is going
3 to be and know where ours sits so we can have an access
4 straight across. And also with the utilities left
5 there. And we definitely need and definitely want a
6 legal access.

7 Now Marty went back to 1930 something. I
8 can go back to Joseph Aidlin. Joseph Aidlin and I went
9 into his office and he gave me a map. Right there on
10 that map you can see where he allowed me access off a
11 cul-de-sac in lieu of the 14 feet that we have over
12 there or 16 feet. So I'm looking for that legal access.

13 And I'm looking also for the utilities to be
14 subbed out, you know. And like I said, I won't take an
15 access through open space. That is -- that's a hell of
16 a liability for anybody to assume access like that. So
17 -- and basically that's all I have. I'm up for
18 questions if you have any questions.

19 MR. CALAS: I do not have any questions for
20 you at this time. Mr. Montgomery I'm sure will follow
21 up with you regarding your concerns.

22 MR. SANTANA: All right. Okay. Thank you
23 very much.

24 MR. CALAS: Thank you.

25 MR. SANTANA: Water runoff and all that

3
(cont.)

1 stuff we are concerned about.

2 MR. CALAS: Okay.

3 MR. SANTANA: Thank you.

4 MR. CALAS: Thank you.

5 MR. SZALAY: Did Jesus Henao -- okay. Then
6 I have no other speakers at this time. Is there anyone
7 else that would like to speak?

8 MR. CALAS: Okay. Seeing no one, would the
9 applicant like to use their five minute rebuttal period
10 for anything?

11 MS. WILLIAMS: No, we're good.

12 MR. CALAS: Okay. So thank you. Just
13 wanted to remind everyone that the Planning Commission
14 public hearing for this project will be held again in
15 downtown Los Angeles. Notification for that hearing
16 will be at least 30 days in advance of the hearing date.
17 And with that this hearing examiner meeting hearing is
18 now closed. Thank you.

19

20 (WHEREUPON THE PROCEEDINGS CONCLUDED AT 6:28
21 P.M.)

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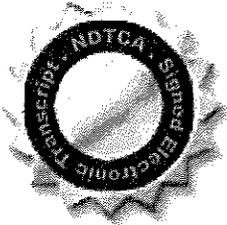
CERTIFICATE
OF
CERTIFIED SHORTHAND REPORTER

The undersigned certified shorthand reporter
of the State of California does hereby certify:

That the foregoing proceedings were taken
before me at the time and place therein set forth.

That the proceedings were recorded
stenographically by me and thereafter transcribed, said
transcript being a true copy of my shorthand notes
thereof.

In witness whereof, I have subscribed my
name this date: January 16, 2016.



[Handwritten signature]

Certificate Number 13079

2.13 RESPONSE TO ORAL COMMENTS K

REGIONAL PLANNING DEPARTMENT HEARING EXAMINER (JANUARY 11, 2016)

Public Testimony

Martin Keegan

Manuel Santana

Pico Canyon Elementary School, Multipurpose Room

25255 Pico Canyon Road

Stevenson Ranch, CA 91381

RESPONSE TO COMMENT K-1.

This comment raises general concerns for water, runoff, police and fire. Please refer to Section 4.7, *Hydrology and Water Quality*, Section 6.0, *Other Mandatory CEQA Considerations*, and Section 4.11, *Public Services*, of the Draft EIR, for an environmental analysis of runoff, water supply and demand, and public services. No further response in this regard is warranted.

RESPONSE TO COMMENT K-2.

This comment raises general concerns for water. Please refer to Section 6.0, *Other Mandatory CEQA Considerations*, of the Draft EIR, for an environmental analysis of water supply and demand. No further response in this regard is warranted.

RESPONSE TO COMMENT K-3.

This comment does not raise any specific environmental concerns or issues regarding the Draft EIR. As such, no further response in this regard is warranted.



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

EDMUND G. BROWN JR., Governor
 CHARLTON H. BONHAM, Director



Letter L

February 5, 2016

Mr. Tyler Montgomery
 Los Angeles County Department of Regional Planning
 320 West Temple Street
 Los Angeles, California 90012
 tmontgomery@planning.lacounty.gov

Subject: Comments on the Draft Environmental Impact Report for the Aidlin Hills Project Community of Stevenson Ranch, Los Angeles County (SCH# 2014091027).

Dear Mr. Montgomery:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Draft Environmental Impact Report (DEIR) for the Aidlin Hills Project (Project) prepared by the County of Los Angeles (County) acting as the Lead Agency under the California Environmental Quality Act (CEQA).

The Project is located in the northern foothills of the Santa Susanna Mountains in an unincorporated section of Los Angeles County known as Stevenson Ranch and is within the Los Angeles County Santa Susanna Significant Ecological Area. The Project site includes 230.5 acres of primarily vacant and undeveloped terrain with moderate to steep variations in topography. Several small to large drainage courses traverse through the site. Pico Canyon Road generally traverses the northern boundary of the Project site with a small portion of the roadway segment occurring in the northeast corner of the site. Various dirt access roads and trails traverse through the site. A single-family residential community abuts the Project site on the east. The area to the west of the Project site is mostly undeveloped within Pico Canyon, but this area includes the remaining historic buildings of Mentryville (a state historic landmark operated by the Santa Monica Mountains Conservancy). The Pico Canyon Trail, a four-mile trail mostly adjacent to Pico Canyon Road and providing access to Mentryville, meanders through Pico Canyon areas generally to the west and southwest of the Project site.

The Project involves developing 102 single-family dwellings and associated supporting infrastructure including load roadways, water tanks and a pump station, water quality treatment basins, and a fire access road. The proposed residential lots would occupy 20.8 acres. The remaining improved areas of the Project site would include 3.9 acres for water tanks/pump stations, 1.5 acres of water quality basins, a 1.4-acre fire access road, and 9.6 acres of public streets. On-site drainage would be diverted to wetland filtration ponds for cleansing prior to discharge into Pico Creek. The Project applicant proposes to widen the segment of Pico Canyon Road on the northern boundary of the Project site. A 24-foot wide paved emergency vehicle access road to the east, connecting with Verandah Court, would be maintained to provide emergency access to the private properties southeast of the Project site. A fuel modification plan for the perimeter portions of the proposed development envelope will be required. Portions of the Project site have been disturbed by access roads and past agricultural or mineral extraction uses. Elevations of the Project site range between 1,460 and 2,250 feet above mean sea level (MSL).

The Project applicant also proposes the preservation of approximately 165 acres of undeveloped, natural area within the southern and western portions of the Project site, in addition to 25.1 acres of landscape area to total 190.1 acres of open space (82.5 percent). The Project would include an open area between Pico Creek and Upper Wickham Canyon after realignment of Wickham Canyon. The Canyon would be enhanced by the planting of additional native trees and shrubs. The Project would require about 1.3 million cubic yards of grading to be balanced on-site. One oak tree would be removed.

The Project site supports suitable habitat for special status wildlife species including but not limited to: white-tailed kite (*Elanus leucurus*) a California fully protected species (FP); Townsend's big-eared bat (*Corynorhinus townsendii*), state threatened (ST); coastal California gnatcatcher (*Poliophtila californica californica*), federally threatened (FT); and the following California species of special concern (SSC): western spadefoot (*Spea hammondi*), silvery legless lizard (*Anniella pulchra pulchra*), coast horned lizard (*Phrynosoma blainvillii*), loggerhead shrike (*Lanius ludovicianus*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), and San Diego desert woodrat (*Neotoma lepida intermedia*).

Based upon a sensitive plant surveys two sensitive mariposa lily species, the slender mariposa lily (*Calochortus clavatus* var. *gracilis*), California rare plant rank (CRPR) 1B.1, and Plummer's mariposa lily (*Calochortus plummerae*), (CRPR 4.2), have been found on the Project site at multiple locations.

Implementation of the Project would impact special status plant communities including: thick-leaved Yerba Santa Scrub, Giant Wild Rye Grassland, California Bush Sunflower Scrub, and Toyon Chaparral.

The Department previously provided comments to the County in a letter dated October 29, 2014 for the Notice of Preparation of the Aidlin Hills Project Draft DEIR.

The following comments and recommendations have been prepared pursuant to the Department's authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*, and pursuant to our authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines § 15386) to assist the Lead Agency in avoiding or minimizing potential project impacts on biological resources.

Specific Comments

Botanical Survey Methodology. The DEIR describes that general sensitive plant surveys were conducted on March 27, 2014, and again on June 15, 2014. Botanical surveys were also conducted on site in 2000 and 2005. Page 4.3-29 of the DEIR states: "Many of the sensitive plant species discussed above may occur within the region, but are not expected to occur within the Project site due to the lack of suitable habitat, the fact that the Project site is outside of the known range or elevation for these species, or negative survey results." The DEIR also described that the seed pods of six individual mariposa lily plants were found within the development footprint during the 2014 sensitive plant surveys.

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cont.)

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The FEIR should confirm if botanical surveys were conducted following the Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (protocol). The protocol may be found on the Department website at: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/protocols_for_surveying_and_evaluating_impacts.pdf. The protocol was recommended in the Department's NOP letter to the County and should be used to direct survey efforts. Conducting focused surveys during the active flowering season using known reference sites with flowering individuals in the project vicinity as recommended in the protocol would assist in surveying the Project site during a period when mariposa lily is flowering to aid identification. Botanical species may be missed on the Project site unless a thorough focused floristic level survey as recommended in the protocol is conducted. Focusing survey efforts on sensitive species with a high probability of occurring on the Project site based upon a literature search, species range and habitat attributes is an adequate beginning species baseline on which to focus survey efforts. However plant species ranges and growing conditions can be variable and unpredictable.

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(cont.)

Project Alternative and Design. The DEIR describes a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. The DEIR identified the No Project Alternative as the environmentally superior alternative and so as recommended in the CEQA Guidelines, the DEIR identified an Environmentally Superior Alternative among the other feasible alternatives. The DEIR explains in Section 5.1 that the "One Valley, One Vision" Density-Control Alternative is the most feasible Environmentally Superior Alternative. This alternative would reduce the project footprint and illuminate the need for an emergency access road across Wickham Canyon. This alternative appears to be rejected in the DEIR by the applicant in favor of the proposed Project because the DEIR describes that the Environmentally Superior Alternative does not meet the fire safety safeguards and achieve the County housing needs.

3

It is not clear why the "One Valley, One Vision" Density-Control Alternative, one of the feasible Project alternatives, was selected and then rejected if it met 11 of the 13 Project objectives. Furthermore this Environmentally Superior Alternative would have met the fire safety standards if only a minor design change were made that included construction of a water tank to aid in wildfire response time. The Environmentally Superior Alternative appears to be rejected because it would result in fewer housing units. The DEIR should consider alternatives to meet the housing units, while remaining within the footprint and project elements of the Environmentally Superior Alternative.

The DEIR describes on page 4.3-46 that a small area of Wickham Canyon will be constrained by the construction of the emergency secondary fire access road and the confluence of Wickham Canyon and Pico Canyon would be replaced by the Project entry access road. As a result, local wildlife movement would be impeded and new travel routes would be required by these animals.

Impeding wildlife movement through the Project area may result in greater adverse human wildlife conflicts. The project also reduces the habitat values of the remaining open space and restricts access to off-site habitats. The Department recommends that the final EIR describe in greater detail how the Project entry access road would impede wildlife movement to the extent that wildlife would need to find alternative travel routes through undeveloped portions of the Project site and offsite habitats at this location. The final EIR should include a Project

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alternative design that allows wildlife greater access along Wickham Canyon to its confluence with Pico Canyon and associated habitat north of the Project. The Department recommends building free span bridges across Wickham Canyon and the Project entry access road would facilitate wildlife movement through these proposed constriction points.

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(cont.)

Impacts to Sensitive Wildlife Species. The DEIR describes that the Project site provides habitat for several sensitive wildlife species however no State or federal listed species were concluded to breed on the Project site based on lack of habitat suitability. Mitigation measures for impacts to sensitive wildlife species include dedication of 165 acres as natural open space to provide habitat for special status wildlife species with potential to occur reproduce on the Project site including but not limited to western spadefoot), silvery legless lizard, coast horned lizard, white-tailed kite, loggerhead shrike, San Diego black-tailed jackrabbit and San Diego desert woodrat. Mitigation measures also include species specific preconstruction surveys and salvage plans to be approved by the County. Salvaged sensitive species will be removed off of Project impact areas and onto the proposed approximately 165 acres of dedicated of natural open space.

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The Department generally concurs with the proposed mitigation measures for sensitive species in the DEIR and recommends that American badger (*Taxidea taxus*) a SCC be included in the survey and take avoidance measures. Take of badger is most often avoided by assuring that active dens are vacant prior to ground disturbances and avoiding take of dependent young during the breeding season.

Mitigation for any western spadefoot detected on the Project site as described in mitigation Measure 4.3-3 should also state that any created spadefoot breeding pond designs be reviewed and approved by the Department; that a spadefoot management plan be written for Department approval and adopted for use. The Management plan should include practices that will implement spadefoot pool and upland habitat management and maintenance in perpetuity and a funding provision to assure that these are accomplished in order to maintain this species in perpetuity within any spadefoot mitigation area proposed for the Project.

6

Impacts to Sensitive Plants and Plant Communities. The DEIR describes that a current sensitive plant survey was conducted within the Project development footprint only and that seed pods assuming to belong to two sensitive mariposa lily species, the slender mariposa lily and Plummer's mariposa lily were found because these two species have been found on the Project site at multiple locations during surveys conducted on the site during previous years. Mitigation measure 4.3-1 describes that the loss of slender and Plummer's mariposa lily individuals from developed areas of the Project site shall be mitigated by the salvage and transplantation of bulbs to appropriate habitat areas within suitable areas within the dedicated natural open space prior to the issuance of a grading permit. If avoidance of lily is not feasible, a lily mitigation plan should be developed which includes seed collection and planting within suitable habitat within the preserved natural open space.

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The DEIR describes that implementation of the Project would impact 0.5 acre (inclusive of 0.1 acre from fuel modification) of the 0.6 acre of thick-leaved Yerba Santa Scrub, 0.7 acre (inclusive of 0.6 acre from fuel modification) of the 4.0 acres of Giant Wild Rye Grassland, all of the 1.3 acres of California Bush Sunflower Scrub, and 6.0 acres (inclusive of 1.9 acres from fuel modification) of 7.5 acres (including 0.7 acre off-site) of Toyon Chaparral. Mitigation Measure 4.3-9 Proposed mitigation measures include on-site restoration or enhancement of sensitive plant communities (e.g., transplantation, seeding, or planting of representative plant community

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species; salvage/dispersal of duff and seed bank) at a ratio no less than 1:1 for temporary impacts and not less than 2:1 for permanent impacts, subject to the approval of the County of Los Angeles. Mitigation may also include the purchase of mitigation credits at an agency-approved off-site mitigation bank within Los Angeles County or in-lieu fee program at a ratio no less than 1:1, subject to the approval of the County.

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(cont.)

As described in the Department's NOP letter, the Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to special status plant species and communities. Studies have shown that these efforts are experimental in nature and largely unsuccessful. The Department recommends mitigation of special status plants and plant communities be implemented by preserving occupied habitat and implementing enhancement practices in perpetuity such as invasive species control and assuring the site is not disturbed by incompatible land uses. Mitigation efforts for special status plants and plant communities should not result in a net loss to other native vegetative communities considered less sensitive in the mitigation area. Furthermore, performing the entirety of the mitigation for special status plant communities on site does not appear practical since the undeveloped areas of the project site do not support these communities at the mitigation levels recommended in the DEIR. The Department recommends exploring off site previously disturbed areas to reduce impacts to less than significant.

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Please verify the statement on Page 6-12 of the DEIR which states: "Mitigation Measure 4.3-3 requires restoration or enhancement of sensitive plant communities." Mitigation measures for sensitive plant communities are described in section 4.3-9 throughout the remainder of the DEIR.

10

Salvage of Native Wildlife. The DEIR proposes to salvage sensitive wildlife species from Project disturbance areas to be moved to appropriate habitat in the adjacent proposed dedicated natural open space area.

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The Department recommends a biological monitor be present before and during initial grubbing and grading operations to salvage and place onto adjacent habitat out of harm's way, all wildlife species of low mobility that may be killed or injured by heavy equipment or other Project activities.

Avoiding Wildlife Mortality During Ground Disturbances. Grubbing and grading should be done so as to avoid islands of habitat where wildlife may take refuge and later be killed by heavy equipment. Grubbing and grading should be done from the center of the Project site, working outward towards adjacent habitat off site where wildlife may safely escape.

12

Impacts to Streams. Page 4.3-2 of the DEIR describes impacts to wetlands and streams on the Project site and states: "The 2000 jurisdictional delineation identified 0.98 acre of wetlands within the Project site in both Pico Creek and Wickham Canyon. The proposed Project would result in impacts to a maximum of 1.22 acre of USACE/RWQCB "waters of the U.S.," 6.23 acres of CDFW jurisdictional streambed and associated riparian habitat, and 0.70 acre of USACE/RWQCB and CDFW jurisdictional wetland. These acreage assessments are considered conservative and greater than the impact acreages that are expected once a formal updated jurisdictional delineation is completed prior to permitting processing. Measure 4.3-4, described would reduce these impacts to a less than significant level." Proposed mitigation includes: On- or off-site restoration or enhancement of USACE/RWQCB jurisdictional waters of the

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U.S./waters of the State and wetlands at a ratio no less than 2:1 for permanent impacts, and for temporary impacts, restore impact area to pre-project conditions (i.e., revegetate with native species, where appropriate). Off-site restoration or enhancement at a ratio no less than 2:1 may include the purchase of mitigation credits at an agency-approved off-site mitigation bank or in-lieu fee program within Los Angeles County or within the same watershed acceptable to the County, where the location has comparable ecological parameters such as habitat types, species mix and elevational range.”

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(cont.)

The Department generally concurs in concept with the mitigation measures described in the DEIR however mitigation measure 4.3-4 appears to be in error as cited at the end of the first paragraph on Page 4.3-42 and should be cited as mitigation measure 4.3-10.

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Page 4.3-46 of the DEIR states: “The emergency secondary fire access road crossing of Wickham Canyon would be designed with a soft bottom with sufficient height and width to allow local wildlife movement to continue along the channel. Thus, wildlife movement through these portions of the Project site would still continue. However, because a small area of Wickham Canyon will be constrained by the construction of the emergency secondary fire access road and the confluence of Wickham Canyon and Pico Canyon would be replaced by the Project entry access road, local wildlife movement would be impeded and new travel routes would be required by these animals.”

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The applicant has submitted a notification to the Department pursuant to section 1600 *et seq.* of the Fish and Game Code. As a Responsible Agency under CEQA Guidelines section 15381, the Department has authority over activities in streams and/or lakes that will divert or obstruct the natural flow; change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream; or use or deposit material from a streambed. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department’s issuance of a LSA for a Project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency, the Department may consider the DEIR of the local jurisdiction (Lead Agency) for the Project. To minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the final DEIR should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA. The final EIR should incorporate proposed stream minimization and mitigation, as described within the Applicant’s draft LSA Agreement issued by the Department.

16

Conditions within any LSA issued by the Department for the Project may be more stringent than those described in the DEIR. For example, the construction of free span bridges and moving multiuse trails farther away from drainage channels and associated habitat to better facilitate wildlife movement opportunities may be representative conditions within any LSA for the Project.

Impacts to Bats. Mitigation Measure 4.3-8 of the DIER states: “The project applicant shall be responsible to avoid the direct loss of non-game animals, including bats, during construction activities. Each structure or suitable habitat area identified as potentially supporting an active bat roost or burrow shall be closely inspected by the biologist no greater than seven (7) days prior to disturbance to more precisely determine the presence or absence of roosting bats or

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non-game wildlife.” M.M. 4.3-8 also states measures “To avoid the potential direct loss of special-status bat species from disturbance to rocky cliff crevices that may provide maternity roost habitat.”

Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment, (Fish and Game Code Section 4150, California Code of Regulations, Section 251.1). Several bat species are also considered California Species of Special Concern (CSC) and meet the CEQA definition of rare, threatened or endangered species (CEQA species. Guidelines 15065). Take of CSC could require a mandatory finding of significance by the Lead Agency, (CEQA Guidelines 15065).

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(cont.)

The Department recommends that Mitigation Measure 4.3-8 include language that states that measures will be taken to avoid impacts to all bat species. If avoidance is not feasible survey and mitigation measures detailed for special status bat species should be applied to all bat species including take avoidance measures based upon surveys and the creation of artificial habitat for unavoidable losses to bat roosts.

Habitat Mitigation Lands Conservation Easement. The Department recommends that all designated Project habitat mitigation land (HML) be protected in perpetuity with minimal human intrusion by recording and executing a perpetual conservation easement in favor of an approved agent dedicated to conserving biological resources. A management and monitoring plan, including a funding commitment, should be developed for the HML and implemented in perpetuity to protect existing biological functions and values.

18

Permeable wildlife fencing should be erected around any HML to restrict incompatible land uses and signage posted and maintained at conspicuous locations communicating these restrictions to the public. Fencing should not be constructed with materials that are harmful to wildlife including, but are not limited to, spikes, glass, razor, or barbed wire. All hollow fence posts should be capped to prevent birds and other wildlife from entering and becoming entrapped. Open bolt holes on metal fence posts can entrap raptors alighting upon the top of the post. These holes should be sealed near the top to prevent raptor mortality.

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We appreciate the opportunity to comment on the referenced DEIR. Questions regarding this letter and further coordination on these issues should be directed to Scott Harris, Environmental Scientist at (805) 644-6305 or scott.p.harris@wildlife.ca.gov

Sincerely,



Betty J. Courtney
Environmental Program Manager I
South Coast Region

cc: Mr. Scott Morgan, State Clearinghouse, Sacramento
Ms. Erinn Wilson, CDFW, Los Alamitos
Mr. Brock Warmuth, CDFW, Ventura

2.14 RESPONSE TO LATE LETTER L

STATE OF CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE (CDFW)

Betty J. Courtney, Environmental Program Manager I

South Coast Region

3883 Ruffin Road

San Diego, CA 92123

RESPONSE TO COMMENT L-1.

This comment summarizes the Project details and existing conditions described in the Draft EIR. Additionally, the commenter states its responsibilities as both a Responsible agency and as a Trustee agency. This comment does not raise any specific environmental concerns or issues regarding the Draft EIR. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT L-2.

The commenter summarizes the botanical survey methods in regards to special-status plant species and requests confirmation that these surveys were conducted following the CDFW protocol described in *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities*. As stated in the *Biological Resources Assessment, Aidlin Hills Project, Santa Clarita, California* included as Appendix C of the Draft EIR technical appendices, a literature review of the biological resources of the study area was undertaken as well as searches of the California Natural Diversity Database (CNDDDB) and the California Native Plant Society (CNPS) sensitive species databases prior to the field investigation. The field surveys are described in Appendix C of the Draft EIR. The list of potential special-status plant species for the Aidlin Hills Project area is provided in Table 2, Sensitive Plant Species, of Appendix C, and each species is provided with a probability assessment of occurrence at the Project site. The flowering periods for the more probable species range from early spring to early summer. The field survey dates were scheduled to cover the full range of flowering. The rainfall during the year of the field surveys was unpredictable and below average, as has become the recent pattern in southern California. Although flowers were not observed, the identity of the *Calochortus* fruits was subsequently confirmed as slender mariposa lily (*Calochortus clavatus* var. *gracilis*) based on previous years' survey results, comparison of fruit shapes of those species whose distribution overlap that of the Project site, and the subsequent observation by the County staff biologist of the presence of the species in close proximity. The field surveys were conducted consistently with the CDFW protocol.

Additionally, Mitigation Measure 4.3-1 requires a pre-construction survey during the peak flowering period for mariposa lilies in order to map the location of all individuals observed for subsequent seed harvest and bulb rescue for transplantation.

RESPONSE TO COMMENT L-3.

The commenter references the project alternatives in Section 5 of the Draft EIR and questions why the "One Valley, One Vision" Density-Control Alternative was rejected if the alternative meets the majority of project objectives. As stated in **Section 5.0, Alternatives** of the Draft EIR, the "One Valley, One Vision" Density-Control Alternative would not meet the objectives of designing development density consistent with the adjacent urban residential neighborhood while preserving topographic slopes, or incorporating multiple fire protection measures to safeguard the Project and the existing adjacent residential community from wildfire

hazards. The “One Valley, One Vision” Density-Control Alternative would also not be a fiscally viable project because the number of residential homes would be insufficient to offset the cost to construct the Alternative. With the increase in housing units, the proposed Project design cannot be restricted to lands east of Wickham Canyon, as in the “One Valley, One Vision” Density-Control Alternative.

RESPONSE TO COMMENT L-4.

The commenter references the impediments to wildlife movement that would result from the proposed Project design and requests greater detail of Project impact on wildlife movement, including a project alternative that allows a corridor within Wickham Canyon to habitats north of Pico Canyon.

The Project entry from Pico Canyon Road would necessitate the primary access road of “A” Street to cross Wickham Canyon. This is because the residences would be located west of Wickham Canyon and public access to the Project site is east of Wickham Canyon. Wildlife access to Pico Canyon would not be completely eliminated but impeded, with the current “at grade” confluence of Wickham Canyon and Pico Canyon being replaced with a box culvert described as project design features (PDF) 8-4 within **Section 4.8**, Hydrology and Water Quality (Page 4.8-15) and labeled as Wickham Canyon Creek Culvert (#1) measuring 12’ wide by 12’ high with a length 210 feet. This culvert would be less conducive to wildlife movement than the existing condition. The use of free-span bridges was not analyzed since the arch culvert design is sufficient to accommodate both the flood flows and wildlife movement beneath the road crossings while minimizing erosion. Additionally, the secondary emergency access road would be used only in emergency egress and therefore it would provide a minor hindrance to wildlife movement over the access road because there would be no interference from regular traffic use. The use of a free-span bridge would not be cost effective for the secondary emergency access road, which is designed only for emergency evacuation and not as a regular ingress-egress route. The topography of the Project site at “A” Street is not conducive to the use of a free-span bridge design.

Although not explicitly mentioned, the “One Valley, One Vision” Density-Control Alternative design allows wildlife greater access along Wickham Canyon to its confluence with Pico Canyon. Section 5.0 states that “Wildlife movement would experience less disruption under this Alternative than the Project because residential uses would be clustered into a smaller footprint on the eastern portion of the Project site.” With the development footprint confined to the east side of Wickham Canyon for the “One Valley, One Vision” Density-Control Alternative, the requested alternative allowing a corridor within Wickham Canyon to habitats north of Pico Canyon has been provided.

RESPONSE TO COMMENT L-5.

The commenter states general concurrence with proposed mitigation measures for sensitive species and recommends that American badger (*Taxidea taxus*) be included in avoidance mitigation measures.

The reason that American badger was not included in the avoidance mitigation measures is because the species was not reported within the CNNDDB database as being within the Project vicinity of the 12 USGS 7.5-minute quadrangles search area. However, the American badger would be added to Mitigation Measure 4.3-5 as a precautionary measure to avoid take of a Species of Special Concern. The revised mitigation measure is the following:

Mitigation Measure 4.3-5 Thirty days prior to construction activities, a qualified biologist shall conduct a survey within the proposed construction disturbance zone and within 200 feet of the disturbance zone for San Diego black-tailed jackrabbit and American badger. If San Diego black-tailed jackrabbits are present, non-breeding rabbits shall be flushed from areas to be disturbed. Dens, depressions, nests, or burrows occupied by pups shall be flagged and ground-disturbing activities avoided within a minimum of 200 feet during the offspring-rearing season (February 15 through July 1).

If American badgers are present, occupied habitat shall be flagged and ground-disturbing activities avoided within 50 feet of the occupied den. Maternity dens shall be avoided during the rearing season (February 15 through July 1) and a minimum 200 foot buffer established. This buffer may be reduced based on the location of the den upon consultation with CDFW. Maternity dens shall be flagged for avoidance, identified on construction maps, and a qualified biologist shall be present during construction. If avoidance of a non-rearing den is not feasible, badgers shall be relocated either by trapping or by slowly excavating the burrow (either by hand or mechanized equipment under the direct supervision of the biologist, before or after the rearing season (February 15 through July 1). Any relocation of badgers shall occur only after consultation with CDFW.

Results of the surveys and relocation efforts shall be provided to the County and CDFW. Collection and relocation of animals shall only occur with the proper scientific collection and handling permits.

RESPONSE TO COMMENT L-6.

The commenter references the Mitigation Measure 4.3-3 for western spadefoot and recommends that a management plan include upland habitat management and maintenance in perpetuity, including a funding provision. Mitigation Measure 4.3-3 has been revised to include a western spadefoot management plan should the species be detected within the Project development footprint. Such management plan would require any on-site relocation pond be protected in perpetuity with a conservation easement, relocation ponds shall be designed such that they only support standing water for several weeks following seasonal rains in order that aquatic predators (e.g., fish, bullfrogs, and crayfish) cannot become established, location of the pond within the proposed Project open space, upland habitat surrounding the proposed relocation site shall be as similar in type, aspect, and density to the location of the existing ponds as feasible, and verification of relocation pond success by annual monitoring of the relocation site for five years to gather evidence of spadefoot reproduction at the relocation site. Western spadefoot ponds are ephemeral by nature and their use by spadefoot are somewhat opportunistic; consequently a funding provision is not appropriate. Mitigation Measure 4.3-3 requires the relocation site to be approved by CDFW, and it is assumed that such relocation site would be either on-site within the dedicated open space or at an off-site mitigation location over which a conservation easement would be placed. The mitigation location would be protected in perpetuity. The revised mitigation measure follows:

Mitigation Measure 4.3-3 Prior to the issuance of a grading permit for ground disturbance, construction, or site preparation activities, the applicant shall retain the services of a qualified biologist to conduct pre construction surveys for western spadefoot within all portions of the Project site containing suitable breeding habitat. Surveys shall be conducted during a time of year when the species is most likely to be detected (e.g., during a normal or greater rain year while rain pools are present and temperatures are suitable for spadefoot activity). If western spadefoot is identified on the Project site, western spadefoot habitat shall be created within suitable natural

sites on the Project site outside the proposed development envelope under the direct supervision of the qualified biologist. The amount of occupied breeding habitat to be impacted by the Project shall be replaced at a 2:1 ratio. The actual relocation site design and location shall be approved by CDFW. The location shall be in suitable habitat, including suitable uplands, as far away as is feasible from any of the homes and roads to be built. The relocation ponds shall be designed such that they only support standing water for several weeks following seasonal rains. The biologist shall conduct pre-construction surveys in all appropriate vegetation communities within the development envelope. All western spadefoot adults, tadpoles, and egg masses encountered shall be collected and released in the identified/created relocation ponds described above.

A western spadefoot management plan shall be required if western spadefoot is identified on the Project site and would include at a minimum, that any on-site relocation pond be protected in perpetuity with a conservation easement, that relocation ponds shall be designed such that they only support standing water for several weeks following seasonal rains in order that aquatic predators (e.g., fish, bullfrogs, and crayfish) cannot become established, that the pond be located within the proposed Project open space or similar conserved land if off-site, that upland habitat surrounding the proposed relocation site shall be as similar in type, aspect, and density to the location of the existing ponds as is feasible, and that relocation pond success be verified by annual monitoring of the relocation site for five years to gather evidence of spadefoot reproduction at the relocation site. The performance criteria for success of the relocation ponds would include that western spadefoot are reproducing at the relocation site after five years of monitoring and the ponds continue to provide suitable habitat with sufficient seasonal pooling for species reproductive success. Results of the surveys and relocation efforts shall be provided to the County. Collection and relocation of animals shall only occur with the proper scientific collection and handling permits. The results of the monitoring would provided in an annual report to both CDFW and the County.

RESPONSE TO COMMENT L-7.

The commenter references the mitigation for impacts to mariposa lilies and suggests that seed collection and planting within suitable habitat be included as part of the mariposa lily mitigation plan. Mitigation Measure 4.3-1 requires a seed collection component and that mitigation areas be selected based on habitat quality and suitability. The commenter's suggestion is consistent with the requirements of Mitigation Measure 4.3-1 and no further response is necessary.

RESPONSE TO COMMENT L-8.

The commenter references Mitigation Measure 4.3-9 for the restoration and enhancement for impacts to sensitive plant communities but does not provide any specific comment regarding the mitigation measure. This comment does not raise any specific environmental concerns or issues regarding the Draft EIR. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT L-9.

The commenter indicates that CDFW does not support the relocation, salvage, or transplantation as mitigation for impacts to special-status plant species because there is insufficient literature supporting the success of such mitigation efforts. The CDFW's preferred mitigation is the preservation of occupied habitat supplemented by enhancement activities. The comment states that there should be no loss of native vegetation communities, including non-sensitive communities, in the implementation of mitigation. The commenter recommends the use of off-site areas for the implementation of Mitigation Measure 4.3-9.

The County concurs that the preferred mitigation for impacts to special-status plant species is the avoidance and preservation of occupied habitat. When that is not possible, re-established efforts are warranted in cases where the plants species are relatively easy to propagate. It is acknowledged that mitigation for impacts to special-status plant species is not always successful in spite of good faith efforts. However, through past failures, improved techniques for successful relocation of special-status plants species have been developed. Success of these measures is dependent upon the species for mitigation, the care in selection of mitigation sites, and the care monitoring the mitigation efforts.

The enhancement practice of invasive species control in perpetuity at this Project location is not practical because of the likelihood for continual reintroduction of invasive species from surrounding areas. In addition, precluding the use of any non-sensitive native community as a mitigation site for either special-status plant establishment or replacement for sensitive plant communities is a high burden that is not warranted given that type habitat conversion can result from natural causes such as wild fires.

Mitigation Measure 4.3-9 allows both on-site and off-site mitigation efforts for the restoration or enhancement of the impacted sensitive plant communities. Where on-site mitigation sites are insufficient to the mitigation requirements, off-site locations would be required. This would be determined at the time of final habitat mitigation and monitoring plan approval.

RESPONSE TO COMMENT L-10.

The commenter requests verification that Mitigation Measure 4.3-3 referenced in Section 6 (page 6-12) should be to Mitigation Measure 4.3-9 in regard to restoration and enhancement of sensitive plant communities. The commenter is correct. The statement on Page 6-12 should be to Mitigation Measure 4.3-9, and this change is corrected in Chapter 3, *Corrections and Additions to the Draft EIR*, of this Final EIR. In addition, the statement on Page 4.3-37 referring to Mitigation Measure 4.3-3 should also correctly refer to Mitigation Measure 4.3-9.

RESPONSE TO COMMENT L-11.

The commenter recommends the presence of a biological monitor during initial grubbing and grading to place low mobility wildlife out of harm's way. Because a biological monitor is a component of the wildlife avoidance mitigation measures, it is appropriate that a biological monitor be present before and during initial grubbing and grading operations to salvage and place onto adjacent habitat any wildlife species that may be killed or injured by heavy equipment activities. Mitigation Measure 4.3-11 has been revised to require the presence of a biological monitor during grubbing and grading operations. The revised mitigation measure follows:

Mitigation Measure 4.3-11 Prior to the issuance of any grading permit that would require removal of potential habitat for raptor and songbird nests, the Project applicant shall contract for the services of a biological monitor acceptable to the County to be present before and during initial grubbing and grading operations to salvage and place onto adjacent habitat any wildlife species that may likely be killed or injured by heavy equipment activities. The Project applicant shall demonstrate to the satisfaction of the County of Los Angeles that either of the following have been or would be accomplished:

1. Proposed Project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1-August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.
2. If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys beginning thirty days prior to the initiation of Project activities, to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 500 feet of the disturbance area. The surveys should continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of Project activities. If a protected native bird is found, the Project proponent should delay all Project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, Project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, must be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, or construction fencing should be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the Project activities and the nest. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. The Project proponent should provide the Department of Regional Planning the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.

If the biological monitor determines that a narrower buffer between the Project activities and observed active nests is warranted, he/she should submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the Project activities and the nest and foraging areas) to the Department of Regional Planning and, upon request, the CDFW. Based on the submitted information, the Department of Regional Planning (and the CDFW, if the CDFW requests) would determine whether to allow a narrower buffer.

The biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the Project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to Project activities. The biological monitor shall send weekly monitoring reports to the Department of Regional Planning during the grubbing and clearing of vegetation, and shall notify the Department of Regional Planning immediately if Project activities damage active avian nests.

RESPONSE TO COMMENT L-12.

The commenter recommends that grubbing and grading activities avoid temporary creation of habitat islands and to commence grading operations from the center outward. This is a commendable recommendation but it is not practical in most instances because of site topography and area accessibility. In addition, beginning in the center of the development footprint provides a scenario where low mobility animals could become trapped into areas along the eastern or northern Project boundaries where escape may not be possible. With the western and southern portions of the Project site to remain as open space, it seems more prudent to begin ground disturbance operations in the northwest corner, closest to Pico Canyon Road, and as best possible to move in a southwestern direction.

RESPONSE TO COMMENT L-13.

The commenter summarizes the Draft EIR details regarding jurisdictional resources and Mitigation Measure 4.3-10 (referenced as Mitigation Measure 4.3-4 in the comment letter). This comment does not raise any specific environmental concerns or issues regarding the Draft EIR. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT L-14.

The commenter states the CDFW general concurrence with the mitigation measure for impacts to jurisdictional streams. The comment continues with the correct observation that the referenced Mitigation Measure 4.3-4 on page 4.3-42 should reference Mitigation Measure 4.3-10. The reference on Page 4.3-42 should be to Mitigation Measure 4.3-10, and this change is corrected in Chapter 3, *Corrections and Additions to the Draft EIR*, of this Final EIR.

RESPONSE TO COMMENT L-15.

The commenter describes the Draft EIR statement about Wickham Canyon being crossed in two locations, which would be an impediment to wildlife movement. This comment does not raise any specific environmental concerns or issues regarding the Draft EIR. As such, no further response in this regard is warranted.

RESPONSE TO COMMENT L-16.

The commenter acknowledges that the Project proponent has submitted notification to CDFW pursuant to Section 1602 of the California Fish and Game Code. The commenter continues that the Final EIR should incorporate proposed stream minimization and mitigation as described in the notification application. The commenter also states that CDFW streambed alteration agreement conditions may be more stringent than those described in the Draft EIR and cites as examples the construction of free-span bridges and moving of the multiuse trails.

The stream minimization features included in the CDFW notification application are the preservation of approximately 165 acres of undeveloped, natural area within the southern and western portions of the Project site (more than 70% of the Project site), the elimination of all residential lots east of the Wickham Canyon drainage, the construction of an earthen-bottom arch culvert for the secondary/emergency access crossing associated with westward extension of Verandah Court. The result of these minimization features is the clustering of development within the northern portion of the Project site, close to the main access road from Pico Canyon Road to the north and proximate to existing residential development (and infrastructure)

to the east. A large extent of Wickham Canyon within the southern and central portions of the Project site, which includes riparian habitat and several Southern California black walnut and coast live oak trees, would be avoided by the proposed development. The development as designed avoids approximately 60% of CDFW jurisdiction on the Project site. It is acknowledged that the streambed alteration agreement issued by CDFW may require more stringent conditions than described in this EIR.

The County trail alignment was designated during the development and adoption of the Santa Clarita Valley Area Plan in 2012. The precise alignment location was determined in conjunction with the County Department of Parks and Recreation trails coordinator. The uses of the extension of Pico Canyon Trail are consistent with the County Department of Parks and Recreation trail standards.

The objective of a free-span bridge from a biological perspective is to facilitate wildlife movement within Wickham Canyon, as is currently possible. A free-span bridge is not required to accomplish this, since the arch culvert design over Wickham Canyon is sufficient to accommodate both the flood flows and wildlife movement beneath the road crossings. The use of a free-span bridge would not be cost effective for the secondary emergency access road, which is designed only for emergency evacuation and not as a regular ingress-egress route. The topography of the Project site at "A" Street is not conducive to the use of a free-span bridge design.

RESPONSE TO COMMENT L-17.

The commenter restates the Draft EIR information concerning bats and specifically references Mitigation Measure 4.3-8. The commenter continues in citing California Fish and Game Code protection for non-game mammals and indicating that a "take" of Species of Special Concern would be a significant impact. The commenter recommends inclusion of language to avoid take of all bat species and the creation of artificial habitat for unavoidable losses of bat roosts.

Mitigation Measure 4.3-8 provides avoidance mitigation for bat species. There are no abandoned structures on the Project site that may provide roost locations for bats. However, there are rock outcrops that could provide roost sites, and the majority of these are outside the development footprint. In order to accurately assess the potential for roosting habitat, a bat specialist would survey the Project site prior to commencement of construction. Mitigation Measure 4.3-8 also includes a requirement for roost replacement where unavoidable losses would occur. Therefore, Mitigation Measures 4.3-8 includes the provisions recommended.

RESPONSE TO COMMENT L-18.

The commenter recommends that habitat mitigation lands be protected in perpetuity. In addition, the commenter recommends that such mitigation lands have a management and monitoring plan prepared and a funding commitment for implementation of the plan. The County agrees that all lands offered for mitigation should be protected with a conservation easement. Mitigation Measure 4.3-2 requires the dedication of 165 acres of open space. The usual method of demonstrating compliance with such a dedication is the recordation of a conservation easement. The conservation easement language would include provision for the continuance of the conservation land value in perpetuity. The Project proponent is amenable to conveying the open space to an acceptable land steward, which would manage the area for the perpetuation of the biological resources. The land steward entity would incorporate management and monitoring requirements for Mitigation Measures 4.3-1 and 4.3-9, and a separate management and monitoring plan for

the overall mitigation lands would be a component of the open space conveyance. Lastly, the mitigation lands would include monitoring for five years of the special-status species and sensitive plant communities establishment mitigation efforts, which may include adaptive management actions. Consequently, a funding commitment is not warranted because the performance standards must be achieved before mitigation compliance can be cleared, which is a financial obligation of the Permittee.

RESPONSE TO COMMENT L-19.

The commenter recommends the installation of permeable wildlife fencing around habitat mitigation lands. Most residential backyards would likely be fenced. Fencing delineating the conserved open space lands is not proposed, as these areas would be conspicuous by their native vegetation. However, it is appropriate as a condition of approval to require appropriate signage near access points describing the nature of the open space and the limited uses acceptable for those areas prohibiting recreational access. Further, the Project would include installation of wildlife permeable bollards or other prohibitive structures to inhibit mountain bikes or off-road vehicles from gaining access to open space areas. This provision to install wildlife permeable bollards at potential open space access locations has been added as Project Design Feature 1-5:

PDF 1-5: The Project Applicant will install wildlife permeable bollards or other protective structures to inhibit mountain bikes or off-road vehicles from gaining access to open space areas.

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3. CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

3. CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

Any corrections to the Draft Environmental Impact Report (EIR) text and figures generated either from responses to comments or independently by the County, are stated in this section of the Final EIR. The Draft EIR text and figures have not been modified to reflect these EIR modifications.

These EIR errata are provided to clarify, refine, and provide supplemental information for the Aidlin Hills Project. Changes may be corrections or clarifications to the text and figures of the original Draft EIR. Other changes to the EIR clarify the analysis in the EIR based upon the information and concerns raised by commentors during the public review period. None of the information contained in these EIR modifications constitutes significant new information or changes to the analysis or conclusions of the Draft EIR.

The information included in this EIR erratum that resulted from the public comment process does not constitute substantial new information that requires recirculation of the Draft EIR. The *State CEQA Guidelines*, Section 15088.5, states in part:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:
 - (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
 - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
 - (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
 - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.
- (c) If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified.

- (d) Recirculation of an EIR requires notice pursuant to Section 15087, and consultation pursuant to Section 15086.
- (e) A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.

The changes to the Draft EIR included in these EIR modifications do not constitute “significant” new information because:

- No new significant environmental impact would result from the project or from a new mitigation measure;
- There is no substantial increase in the severity of an environmental impact that would result unless mitigation measures are adopted that reduce the identified significant impacts to a level of insignificance;
- No feasible project alternative or mitigation measure considerably different from others previously analyzed has been proposed or identified that would clearly lessen the significant environmental impacts of the project; and
- The Draft EIR is not fundamentally or basically inadequate or conclusory in nature such that meaningful public review and comment were precluded.

Therefore, recirculation of the Draft EIR is not required because the new information added to the EIR through these modifications clarifies or amplifies information already provided or makes insignificant modifications to the already adequate Draft EIR.

For simplicity, the EIR modifications contained in the following pages are in the same order as the information appears in the Draft EIR. Changes in text are signified by strikeouts (~~strikeouts~~) where text has been removed and by double underlining (underline) where text has been added. The applicable page numbers from the Draft EIR are also provided where necessary for easy reference.

3.1 CORRECTIONS AND ADDITIONS

The corrections and additions to the Draft EIR are presented below. A line through text indicates it has been deleted, while double underlined text is text that has been added.

Executive Summary

1. **Pages ES-16, 17, 18, 23, 26 and 47. Modify text within Mitigation Measures 4.3-3, 4.3-5, 4.3-9, 4.3-11, and 4.12-1 within Table ES-1:**

Mitigation Measures

Mitigation Measure 4.3-3 Prior to the issuance of a grading permit for ground disturbance, construction, or site preparation activities, the applicant shall retain the services of a

qualified biologist to conduct pre-construction surveys for western spadefoot within all portions of the Project site containing suitable breeding habitat. Surveys shall be conducted during a time of year when the species is most likely to be detected (e.g., during a normal or greater rain year while rain pools are present and temperatures are suitable for spadefoot activity). If western spadefoot is identified on the Project site, western spadefoot habitat shall be created within suitable natural sites on the Project site outside the proposed development envelope under the direct supervision of the qualified biologist. The amount of occupied breeding habitat to be impacted by the Project shall be replaced at a 2:1 ratio. The actual relocation site design and location shall be approved by CDFW. The location shall be in suitable habitat, including suitable uplands, as far away as is feasible from any of the homes and roads to be built. The relocation ponds shall be designed such that they only support standing water for several weeks following seasonal rains. The biologist shall conduct pre-construction surveys in all appropriate vegetation communities within the development envelope. All western spadefoot adults, tadpoles, and egg masses encountered shall be collected and released in the identified/created relocation ponds described above.

A western spadefoot management plan shall be required if western spadefoot is identified on the Project site and would include at a minimum, that any on-site relocation pond be protected in perpetuity with a conservation easement, that relocation ponds shall be designed such that they only support standing water for several weeks following seasonal rains in order that aquatic predators (e.g., fish, bullfrogs, and crayfish) cannot become established, that the pond be located within the proposed Project open space or similar conserved land if off-site, that upland habitat surrounding the proposed relocation site shall be as similar in type, aspect, and density to the location of the existing ponds as is feasible, and that relocation pond success be verified by annual monitoring of the relocation site for five years to gather evidence of spadefoot reproduction at the relocation site. The performance criteria for success of the relocation ponds would include that western spadefoot are reproducing at the relocation site after five years of monitoring and the ponds continue to provide suitable habitat with sufficient seasonal pooling for species reproductive success. Results of the surveys and relocation efforts shall be provided to the County. Collection and relocation of animals shall only occur with the proper scientific collection and handling permits. **The results of the monitoring will provided in an annual report to both CDFW and the County.**

Mitigation Measure 4.3-5 Thirty days prior to construction activities, a qualified biologist shall conduct a survey within the proposed construction disturbance zone and within 200 feet of the disturbance zone for San Diego black-tailed jackrabbit and American badger. If San Diego black-tailed jackrabbits are present, non-breeding rabbits shall be flushed from areas to be disturbed. Dens, depressions, nests, or burrows occupied by pups shall be flagged and ground-disturbing activities avoided within a minimum of 200 feet during the offspring-rearing season (February 15 through July 1).

If American badgers are present, occupied habitat shall be flagged and ground-disturbing activities avoided within 50 feet of the occupied den. Maternity dens shall be avoided during the rearing season (February 15 through July 1) and a minimum 200 foot buffer established. This buffer may be reduced based on the location of the den upon consultation with CDFW. Maternity dens shall be flagged for avoidance, identified on

construction maps, and a qualified biologist shall be present during construction. If avoidance of a non-rearing den is not feasible, badgers shall be relocated either by trapping or by slowly excavating the burrow (either by hand or mechanized equipment under the direct supervision of the biologist, before or after the rearing season (February 15 through July 1). Any relocation of badgers shall occur only after consultation with CDFW.

Results of the surveys and relocation efforts shall be provided to the County and CDFW. Collection and relocation of animals shall only occur with the proper scientific collection and handling permits.

Mitigation Measure 4.3-9 Impacts to sensitive plant communities (i.e., Thick-leaved Yerba Santa Scrub, Giant Wild Rye Grassland, California Bush Sunflower Scrub, Toyon Chaparral, and Foothill Ash Scrub) shall be mitigated using one or more of the following:

- On-site restoration or enhancement of sensitive plant communities (e.g., transplantation, seeding, or planting of representative plant community species; salvage/dispersal of duff and seed bank) at a ratio no less than 1:1 for temporary impacts and not less than 2:1 for permanent impacts, subject to the approval of the County of Los Angeles.
- Purchase of mitigation credits at an agency-approved off-site mitigation bank within Los Angeles County or in-lieu fee program at a ratio no less than 1:1, subject to the approval of the County of Los Angeles.

If mitigation is to occur on-site or off-site, a habitat mitigation and monitoring plan shall be prepared and approved by the County Biologist prior to the issuance of a grading permit. The plan shall focus on the creation of equivalent habitats within disturbed habitat areas of the project site or off-site. In addition, the plan shall provide details as to the implementation of the plan, maintenance, and future monitoring including the following components:

- Description of existing sensitive habitats on the Project site;
- Summary of permanent impacts to sensitive communities based on approved Project design;
- Proposed location for mitigation areas, either on-site or off-site, with description of existing conditions prior to mitigation implementation;
- Detailed description of restoration or enhancement goals;
- Description of implementation schedule, site preparation, erosion control measures, planting plans, and plant materials;
- Provisions for mitigation site maintenance and control on non-native invasive plants;
- Provision to monitor development perimeter for presence of Argentine ant and control if present; and
- Monitoring plan, including performance standards, adaptive management measures, and monitoring reporting to the County of Los Angeles.

Mitigation Measure 4.3-11 Prior to the issuance of any grading permit that would require removal of potential habitat for raptor and songbird nests, the Project applicant shall contract for the services of a biological monitor acceptable to the County to be present before and during initial grubbing and grading operations to salvage and place onto adjacent habitat any wildlife species that may likely be killed or injured by heavy equipment activities. The Project applicant shall demonstrate to the satisfaction of the County of Los Angeles that either of the following have been or will be accomplished:

1. Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1-August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.
2. If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys beginning thirty days prior to the initiation of project activities, to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 500 feet of the disturbance area. The surveys should continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of project activities. If a protected native bird is found, the project proponent should delay all project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, must be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, or construction fencing should be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the nest. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. The project proponent should provide the Department of Regional Planning the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.
3. If the biological monitor determines that a narrower buffer between the project activities and observed active nests is warranted, he/she should submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to the Department of Regional Planning and, upon request, the CDFW. Based on the submitted information, the Department of Regional Planning (and the CDFW, if the CDFW requests) will determine whether to allow a narrower buffer.

4. The biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to the Department of Regional Planning during the grubbing and clearing of vegetation, and shall notify the Department of Regional Planning immediately if project activities damage active avian nests.

Mitigation Measure 4.12-1 Prior to the issuance of an encroachment permit within the public right-of-way, the Permittee, in coordination with the Los Angeles County DPW, shall devise a Traffic Control Plan to be implemented during construction of the Project. The Traffic Control Plan shall identify all traffic control measures, signs, and delineators to be implemented by the construction contractor through the duration of construction activities associated with the Project improvements for Pico Canyon Road. Further, the Traffic Control Plan would include provisions for the construction contractor to transport large-size trucks during off-peak hour commute periods. The Traffic Control Plan shall be subject to final approval by the Los Angeles County DPW.

Section 2.0 – Project Description

1. **Page 2-14. Modify text in the third paragraph as follows in order to reference updated data:**

Subject to Project approval and issuance of grading and construction permits, Project ~~construction is conceptually anticipated to commence in November 2015–2016 and conclude in July 2019~~ with grading operations anticipated to commence in ~~November 2015~~ September 2016 and conclude in ~~June 2016~~ February 2017. Infrastructure installation would commence in ~~May~~ December 2016, starting with sewer (about four months) and followed by storm drain (about six months), water (about six months), street hardscape (about two months), and other utilities (about four months). The anticipated daily construction schedule in accordance with County regulations would be 7:00 AM to 6:00 PM, six days a week. The majority of these construction phases would overlap. Residential house construction is estimated to begin in January 2017, being constructed in multiple phases over an approximately two and one half year period. A construction staging area would be set up on-site near Pico Canyon Road and would include a construction trailer and construction worker parking.

Section 4.1 – Aesthetics

1. **Page 4.1-2. Modify text in third paragraph by revising “Draft” to “Adopted” General Plan:**

The ~~Draft~~ Adopted Los Angeles County General Plan 2035 represents a comprehensive effort to update the County’s 1980 General Plan and provides the policy framework for how and where the unincorporated areas will grow through the year 2035. Goals and polices related to scenic resources are primary contained in the Conservation and Natural Resources Element of the ~~Draft~~ Adopted General Plan. As shown Figure 9.7, Scenic Highways, of the Los Angeles County General Plan 2035, a portion of I-5 southeast of the Project site is designated as an eligible scenic highway.

2. Page 4.1-3. Modify text in first paragraph by revising “Draft” to “Adopted” General Plan:

A major policy change in the Draft General Plan compared to the ~~a~~Adopted General Plan is the expansion of SEAs. The objective of the SEA Program is to preserve the genetic and physical diversity of the County by designating biological resource areas capable of sustaining themselves into the future. The SEA Program is intended to ensure that privately held lands within the SEAs retain the right of reasonable use, while avoiding activities and development projects that are incompatible with the long term survival of the SEAs. Other changes to the ~~Draft~~ Adopted Los Angeles County General Plan 2035 include the development of land use and design policies to encourage mixed-use and transit oriented development, greater protection of the scenic and environmental attributes of rural areas, and policies to improve the interface between urban and rural areas of the County.

3. Page 4.1-11. Modify text in PDF 1-4 by addition of sentence:

PDF 1-4: The Project’s landscape design will utilize a plant palette consisting of fire retardant plants, native and appropriate non-native drought tolerant species. The Project’s landscaping would be made up of a mixture of low growing ground cover, medium to large shrubs and trees. As shown, landscaping and visual buffers would be concentrated along the perimeter of the proposed developed areas, including adjacent to main entryway to the Project from Pico Canyon Road, the new emergency access road, and adjacent to the Southern Oaks neighborhood. The concentration of landscaping in these areas would serve as natural visual buffers between the proposed homes and streets and existing residences, roadways, and trails. To reduce the impacts associated with graded areas and construction of the main Project entry road and emergency access road, these areas would be revegetated and landscaped as soon as feasible following grading and roadway development. The Project site would also incorporate landscaping between the internal residential streetscape system. All landscape plants in the small area located outside the CLWA service area near the proposed water tanks and service road would consist of locally indigenous species, which would temporarily receive imported water/irrigation from mobile tanks during initial establishment only.

3. Page 4.1-11. Modify text by addition of PDF 1-5:

PDF 1-5: The Project Applicant will install wildlife permeable bollards or other protective structures to inhibit mountain bikes or off-road vehicles from gaining access to open space areas.

Section 4.2 – Air Quality

1. Page 4.2-12. Modify text in second and fourth paragraph and by revising “Draft” to “Adopted” General Plan and removing “January 2014”:

The ~~Draft~~ Adopted County of Los Angeles General Plan 2035, ~~January 2014~~, provides the fundamental basis for the County’s land use and development policy, and represents the basic community values, ideals, and aspirations to govern a shared environment through 2035. The General Plan addresses all aspects of development including public health, land use, community character, transportation, economics, housing, air quality, and other topics. The General Plan sets forth objectives, policies, standards, and programs for land use and new development, Circulation and Public access, and Service Systems for the Community as a whole.

~~Although the General Plan is only in draft format, and the~~ The Project is ~~not~~ subject to the ~~draft~~ Adopted General Plan goals and policies ~~that may change prior to adoption, and~~ applicable measures of the Los Angeles County General Plan Air Quality element are specified below as being the most current standards. These measures will be implemented in connection with development of the Project.

2. Page 4.2-27. Modify text in the last paragraph as follows in order to reference updated data:

Construction of the Project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project site. In addition, fugitive dust emissions would result from grading and construction activities. Project construction is anticipated to begin in ~~late 2015~~ September 2016 and conclude in mid-2019. Construction would begin with grading operations lasting for approximately 7 months. The Project site is located in the foothills and would require approximately 1,600,000 cubic yards of cut material, with all cut material being used as fill material within the site. Accordingly, the Project grading plan would balance the grading quantities such that no import or export of soil would be required. Utility and infrastructure installation would begin in ~~mid 2016~~ December 2016 and ~~would be completed by early 2017~~. Utility and infrastructure installation would start with sewer (about four months), followed by storm drain (about six months), water (about six months), street hardscape (about two months) and other utilities (about four months). The majority of these steps would overlap. Project housing construction is estimated to begin in early 2017 and would be constructed in multiple phases over an approximately two-and-one-half year period. In total, construction would require approximately 45 months. A complete listing of the construction equipment by phase and the duration of construction activities is included in Appendix B.

3. Page 4.2-33. Modify text in second paragraph and by revising “Draft” to “Adopted” General Plan:

The ~~Draft~~ Adopted 2035 County of Los Angeles General Plan was prepared in response to California state law requiring that each city and county adopt a long-term comprehensive general plan. This plan must be integrated, internally consistent, and present goals, objectives, policies, and implementation guidelines for decision makers to use. The County has included an Air Quality Element as part of its General Plan to aid the greater Los Angeles region in attaining the state and federal ambient air quality standards at the earliest feasible date, while still maintaining economic growth and improving the quality of life. The County’s Air Quality Element acknowledges the inter-relationships between transportation and land use planning in meeting mobility and clean air goals. ~~Because the General Plan is only in draft format, and the~~ The Project is ~~not~~ subject to the ~~draft~~ Adopted General Plan goals and policies ~~that may change prior to adoption, and~~ since the Project has been accounted for in regional population and transportation projections, it is concluded that the Project would be consistent with County air quality policies.

4. Page 4.2-35. Modify text in the table as follows in order to reference updated data:

Table 4.2-4

Maximum Unmitigated Regional Construction Emissions^a
(pounds per day)

Construction Activity	VOC	NO _x	CO	SO ₂	PM ₁₀ ^b	PM _{2.5} ^b
Grading (2015 16)	11	124	75	<1	10	7
Grading (2016 17)	10	115	72	<1	10	6
Grading & Utilities (2016 and 2017)	13	136	88	<1	12	8
Utilities (2016 and 2017)	2	21	16	<1	2	1
Utilities & Streets (2016)	5	43	32	<1	3	3
Utilities & Streets (2017)	5	40	32	<1	3	2
Utilities & Streets & Bldg. Constr. (2017)	10	77	74	<1	8	5
Utilities & Bldg. Constr. (2017)	7	56	58	<1	7	4
Bldg. Constr. (2017)	5	37	42	<1	5	3
Bldg. Constr. & Coating (2017)	11	40	48	<1	6	3
Bldg. Constr. & Coating (2018)	10	36	45	<1	6	3
Bldg. Constr. & Coating (2019)	10	32	43	<1	5	3
Maximum Regional Emissions	13	136	88	<1	12	8
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Over/(Under)	(62)	36	(462)	(150)	(138)	(47)
Exceed Threshold?	NO	YES	NO	NO	NO	NO

^a Emission quantities are rounded to "whole number" values. As such, the "total" values presented herein may be one unit more or less than actual values. Values that exceed the thresholds are shown in bold with a shaded background. Exact values (i.e., non-rounded) are provided in the CalEEMod model printout sheets and/or calculation worksheets that are presented in Appendix B.

^b PM₁₀ and PM_{2.5} emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.

Source: PCR Services Corporation, 2015

5. Page 4.2-45. Modify text in the table as follows in order to reference updated data:

Table 4.2-8

Maximum Mitigated Regional Construction Emissions^a
(pounds per day)

Construction Activity	VOC	NO _x	CO	SO ₂	PM ₁₀ ^b	PM _{2.5} ^b
Grading (2015 <u>16</u>)	4	58	67	<1	7	4
Grading (2016 <u>17</u>)	4	57	67	<1	7	4
Grading & Utilities (2016 <u>and 2017</u>)	6	78	83	<1	9	6
Utilities (2016 <u>and 2017</u>)	2	21	15	<1	2	1
Utilities & Streets (2016)	5	43	32	<1	3	3
Utilities & Streets (2017)	5	40	32	<1	3	2
Utilities & Streets & Bldg. Constr. (2017)	10	77	74	<1	8	5
Utilities & Bldg. Constr. (2017)	7	56	58	<1	7	4
Bldg. Constr. (2017)	5	37	42	<1	5	3
Bldg. Constr. & Coating (2017)	11	40	48	<1	6	3
Bldg. Constr. & Coating (2018)	10	36	45	<1	6	3
Bldg. Constr. & Coating (2019)	10	32	43	<1	5	3
Maximum Regional Emissions	11	78	83	<1	9	6
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Over/(Under)	(64)	(22)	(467)	(150)	(141)	(49)
Exceed Threshold?	NO	NO	NO	NO	NO	NO

^a Emission quantities are rounded to "whole number" values. As such, the "total" values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the CalEEMod model printout sheets and/or calculation worksheets that are presented in Appendix B.

^b PM₁₀ and PM_{2.5} emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.

Source: PCR Services Corporation, 2015

Section 4.3 – Biological Resources

1. Page 4.3-34. Modify Mitigation Measure 4.3-3:

Mitigation Measures

Mitigation Measure 4.3-3 Prior to the issuance of a grading permit for ground disturbance, construction, or site preparation activities, the applicant shall retain the services of a qualified biologist to conduct pre construction surveys for western spadefoot within all portions of the Project site containing suitable breeding habitat. Surveys shall be conducted during a time of year when the species is most likely to be detected (e.g., during a normal or greater rain year while rain pools are present and temperatures are suitable for spadefoot activity). If western spadefoot is identified on the Project site, western spadefoot habitat shall be created within suitable natural sites on the Project site outside the proposed development envelope under the direct supervision of the qualified

biologist. The amount of occupied breeding habitat to be impacted by the Project shall be replaced at a 2:1 ratio. The actual relocation site design and location shall be approved by CDFW. The location shall be in suitable habitat, including suitable uplands, as far away as is feasible from any of the homes and roads to be built. The relocation ponds shall be designed such that they only support standing water for several weeks following seasonal rains. The biologist shall conduct pre-construction surveys in all appropriate vegetation communities within the development envelope. All western spadefoot adults, tadpoles, and egg masses encountered shall be collected and released in the identified/created relocation ponds described above.

A western spadefoot management plan shall be required if western spadefoot is identified on the Project site and would include at a minimum, that any on-site relocation pond be protected in perpetuity with a conservation easement, that relocation ponds shall be designed such that they only support standing water for several weeks following seasonal rains in order that aquatic predators (e.g., fish, bullfrogs, and crayfish) cannot become established, that the pond be located within the proposed Project open space or similar conserved land if off-site, that upland habitat surrounding the proposed relocation site shall be as similar in type, aspect, and density to the location of the existing ponds as is feasible, and that relocation pond success be verified by annual monitoring of the relocation site for five years to gather evidence of spadefoot reproduction at the relocation site. The performance criteria for success of the relocation ponds would include that western spadefoot are reproducing at the relocation site after five years of monitoring and the ponds continue to provide suitable habitat with sufficient seasonal pooling for species reproductive success. Results of the surveys and relocation efforts shall be provided to the County. Collection and relocation of animals shall only occur with the proper scientific collection and handling permits. The results of the monitoring will be provided in an annual report to both CDFW and the County.

2. Page 4.3-35. Modify Mitigation Measure 4.3-5:

Mitigation Measures

Mitigation Measure 4.3-5 Thirty days prior to construction activities, a qualified biologist shall conduct a survey within the proposed construction disturbance zone and within 200 feet of the disturbance zone for San Diego black-tailed jackrabbit and American badger. If San Diego black-tailed jackrabbits are present, non-breeding rabbits shall be flushed from areas to be disturbed. Dens, depressions, nests, or burrows occupied by pups shall be flagged and ground-disturbing activities avoided within a minimum of 200 feet during the offspring-rearing season (February 15 through July 1).

If American badgers are present, occupied habitat shall be flagged and ground-disturbing activities avoided within 50 feet of the occupied den. Maternity dens shall be avoided during the rearing season (February 15 through July 1) and a minimum 200 foot buffer established. This buffer may be reduced based on the location of the den upon consultation with CDFG. Maternity dens shall be flagged for avoidance, identified on construction maps, and a qualified biologist shall be present during construction. If avoidance of a non-rearing den is not feasible, badgers shall be relocated either by trapping or by slowly excavating the burrow (either by hand or mechanized equipment under the direct supervision of the biologist, before or after the rearing season (February

15 through July 1). Any relocation of badgers shall occur only after consultation with CDFG.

Results of the surveys and relocation efforts shall be provided to the County and CDFW. Collection and relocation of animals shall only occur with the proper scientific collection and handling permits.

3. Page 4.3-37. Modify Mitigation Measure numbering in last paragraph:

Implementation of the Project would impact 0.5 acre (inclusive of 0.1 acre from fuel modification) of the 0.6 acre of Thick-leaved Yerba Santa Scrub, 0.7 acre (inclusive of 0.6 acre from fuel modification) of the 4.0 acres of Giant Wild Rye Grassland, all of the 1.3 acres of California Bush Sunflower Scrub, and 6.0 acres (inclusive of 1.9 acres from fuel modification) of 7.5 acres (including 0.7 acre off-site) of Toyon Chaparral. Impacts to sensitive plant communities are potentially significant. Implementation of Mitigation Measure 4.3-~~39~~, as detailed below, would reduce this impact to a less than significant level.

4. Page 4.3-42. Modify Mitigation Measure 4.3-9:

Mitigation Measures

Mitigation Measure 4.3-9 Impacts to sensitive plant communities (i.e., Thick-leaved Yerba Santa Scrub, Giant Wild Rye Grassland, California Bush Sunflower Scrub, Toyon Chaparral, and Foothill Ash Scrub) shall be mitigated using one or more of the following:

- On-site restoration or enhancement of sensitive plant communities (e.g., transplantation, seeding, or planting of representative plant community species; salvage/dispersal of duff and seed bank) at a ratio no less than 1:1 for temporary impacts and not less than 2:1 for permanent impacts, subject to the approval of the County of Los Angeles.
- Purchase of mitigation credits at an agency-approved off-site mitigation bank within Los Angeles County or in-lieu fee program at a ratio no less than 1:1, subject to the approval of the County of Los Angeles.

If mitigation is to occur on-site or off-site, a habitat mitigation and monitoring plan shall be prepared and approved by the County Biologist prior to the issuance of a grading permit. The plan shall focus on the creation of equivalent habitats within disturbed habitat areas of the project site or off-site. In addition, the plan shall provide details as to the implementation of the plan, maintenance, and future monitoring including the following components:

- Description of existing sensitive habitats on the Project site;
- Summary of permanent impacts to sensitive communities based on approved Project design;
- Proposed location for mitigation areas, either on-site or off-site, with description of existing conditions prior to mitigation implementation;
- Detailed description of restoration or enhancement goals;

- Description of implementation schedule, site preparation, erosion control measures, planting plans, and plant materials;
- Provisions for mitigation site maintenance and control on non-native invasive plants;
- Provision to monitor development perimeter for presence of Argentine ant and control if present; and
- Monitoring plan, including performance standards, adaptive management measures, and monitoring reporting to the County of Los Angeles.

5. Page 4.3-43. Modify Mitigation Measure numbering in first paragraph:

The 2000 jurisdictional delineation identified 0.98 acre of wetlands within the Project site in both Pico Creek and Wickham Canyon. The proposed Project would result in impacts to a maximum¹ of 1.22 acre of USACE/RWQCB “waters of the U.S.,” 6.23 acres of CDFW jurisdictional streambed and associated riparian habitat, and 0.70 acre of USACE/RWQCB and CDFW jurisdictional wetland (**Figure 4.3-6 Impacts to Jurisdictional Features**). These acreage assessments are considered conservative and greater than the impact acreages that are expected once a formal updated jurisdictional delineation is completed prior to permitting processing. Impacts to jurisdictional waters and wetlands are considered potentially significant. Mitigation Measure 4.3-410, described below, would reduce these impacts to a less than significant level.

6. Page 4.3-48. Modify Mitigation Measure 4.3-11:

Mitigation Measures

Mitigation Measure 4.3-11 Prior to the issuance of any grading permit that would require removal of potential habitat for raptor and songbird nests, the Project applicant shall contract for the services of a biological monitor acceptable to the County to be present before and during initial grubbing and grading operations to salvage and place onto adjacent habitat any wildlife species that may likely be killed or injured by heavy equipment activities. The Project applicant shall demonstrate to the satisfaction of the County of Los Angeles that either of the following have been or will be accomplished:

1. Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1-August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.

¹ PCR's 2014 site visit did not include a formal updated jurisdictional delineation. Based on current regulatory requirements and PCR's observations during the 2014 assessment, it is anticipated that an updated jurisdictional delineation performed for the regulatory permitting process will indicate a reduced total wetland/waters acreage mapped within the Project site, and associated impacts to jurisdictional areas.

2. If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys beginning thirty days prior to the initiation of project activities, to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 500 feet of the disturbance area. The surveys should continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of project activities. If a protected native bird is found, the project proponent should delay all project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, must be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, or construction fencing should be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the nest. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. The project proponent should provide the Department of Regional Planning the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.

If the biological monitor determines that a narrower buffer between the project activities and observed active nests is warranted, he/she should submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to the Department of Regional Planning and, upon request, the CDFW. Based on the submitted information, the Department of Regional Planning (and the CDFW, if the CDFW requests) will determine whether to allow a narrower buffer.

The biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to the Department of Regional Planning during the grubbing and clearing of vegetation, and shall notify the Department of Regional Planning immediately if project activities damage active avian nests.

Section 4.4 – Cultural Resources

1. Page 4.4-6 and 4.4-7. Modify text in last paragraph:

The Tataviam relied primarily on vegetable foods such as the buds of *Yucca whipplei*, acorns, juniper berries, sage seeds, and islay berries. Animal foods consisted of small mammals, deer, and antelope. Information recovered from Bowers's Cave located between Piru and Newhall suggests that there are major similarities among the Tataviam, Chumash and Gabrielino ritual organization. Ritual paraphernalia similar to that described by the Ventureño Chumash used by secret society members in the performance of ceremonies was found at Bowers's Cave. In addition, the Tataviam also appeared to have held their annual mourning

ceremony in the late summer or early fall, just as did their southern neighbors. During historic times and by 1810, all the Tataviam had been baptized at the San Fernando Mission. In 1834, the Indians were to retain Mission land under government trust and protection, and had the right to organize electoral village governments under the Secularization Act. They retained their Tataviam identity, and continued to intermarry with lineages associated with the neighboring villages, as they did prior to the Mission period (FTBMI personal communication, 2015). ~~By 1834, the descendants of the Tataviam had married into other groups at the mission or in the Tejon Region. According to Kimia Fatehi, representative for the Tataviam Tribe, “these tribelets contained 250 to 300 people, with lineages having approximately 100 people. Through the San Fernando Mission registers [which are not open to the public], lineages from prehistoric tribelets can be traced to currently enrolled Tataviam tribal members today” (K. Fatehi, personal communication, 2015).~~ By 1916, the last speaker of Tataviam language had passed away (King and Blackburn 1978). The anthropologist A. L. Kroeber explained that the villages or bands “were de facto self-governing, and it was they that each owned a particular territory, rather than that the nationality owned the overall territory. Ordinarily, the nationality, miscalled tribe, was only an aggregate of miniature sovereign states normally friendly to one another” (Kroeber 1955:303). According to the contemporary Fernandeano Tataviam Band of Mission Indians (FTBMI), the entire Fernandeano region (areas from which Indians were recruited to Mission San Fernando) formed a network of intermarriages that produced the basis for cooperative economic and social exchanges. Tribelets were composed of one lineage. Multiple families existed at each village with a lineage. Each family had a captain, or leader, who communicated with the principle village headman, or Tomár. Lineages, which can be found among individuals in the San Fernando Mission registers, are traced to currently enrolled Tataviam tribal citizens today (FTBMI personal communication, 2015).

Section 4.5 – Geology and Soils

1. Page 4.5-4. Modify text in first paragraph by revising “Draft” to “Adopted” General Plan and removing “(2014)”:

Local

Los Angeles County ~~Draft~~ Adopted General Plan 2035 ~~(2014)~~

Chapter 12, Safety Element

Section 4.6 – Greenhouse Gases

1. Page 4.6-7. Include the following text:

Cap-and-Trade Program

The Climate Change Scoping Plan identifies a Cap-and-Trade Program as one of the strategies California will employ to reduce GHG emissions. CARB asserts that this program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020, and ultimately achieving an 80 percent reduction from 1990 levels by 2050. Under Cap-and-Trade, an overall limit on GHG emissions from capped sectors is established and facilities subject to the cap will be able to trade permits to emit GHGs.

CARB designed and adopted a California Cap-and-Trade Program² pursuant to its authority under AB 32. The development of this Program included a multi-year stakeholder process and consideration of potential impacts on disproportionately impacted communities. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed “covered entities”) by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32’s emission-reduction mandate of returning to 1990 levels of emissions by 2020. The statewide cap for GHG emissions from the capped sectors³ (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the Program’s duration.

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities that emit more than 25,000 MTCO₂e per year must comply with the Cap-and-Trade Program.⁴ Triggering of the 25,000 MTCO₂e per year “inclusion threshold” is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or “MRR”).⁵

Each covered entity with a compliance obligation is required to surrender “compliance instruments”⁶ for each MTCO₂e of GHG they emit. Covered entities are allocated free allowances in whole or part (if eligible), buy allowances at auction, purchase allowances from others, or purchase offset credits. A “compliance period” is the time frame during which the compliance obligation is calculated. The years 2013 and 2014 are the first compliance period, the years 2015–2017 are the second compliance period, and the third compliance period is from 2018–2020. At the end of each compliance period, each facility will be required to surrender compliance instruments to CARB equivalent to their total GHG emissions throughout the compliance period. There also are requirements to surrender compliance instruments covering 30 percent of the prior year’s compliance obligation by November of each year. For example, in November 2014, a covered entity was required to submit compliance instruments to cover 30 percent of its 2013 GHG emissions.

The Cap-and-Trade Regulation provides a firm cap, ensuring that the 2020 statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade Program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on an accumulative basis. As summarized by CARB in its First Update to the Climate Change Scoping Plan:

The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut

² 17 CCR §§ 95800 to 96023.

³ See generally 17 CCR §§ 95811, 95812.

⁴ 17 CCR § 95812.

⁵ 17 CCR §§ 95100-95158.

⁶ Compliance instruments are permits to emit, the majority of which will be “allowances,” but entities also are allowed to use CARB-approved offset credits to meet up to 8 percent of their compliance obligations.

their GHG emissions have to turn in fewer allowances. **But as the cap declines, aggregate emissions must be reduced.**⁷

In other words, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program. However, as climate change is a global phenomenon and the effects of GHG emissions are considered cumulative in nature, a focus on aggregate GHG emissions reductions is warranted.

Further, the reductions in GHG emissions that will be achieved by the Cap-and-Trade Program inherently are variable and, therefore, impossible to quantify with precision:

The Cap-and-Trade Regulation is different from most of the other measures in the Scoping Plan. The [R]egulation sets a hard cap, instead of an emission limit, so the emission reductions from the program vary as our estimates of “business as usual” emissions in the future are updated. In addition, the Cap-and-Trade Program works in concert with many of the direct regulatory measures—providing an additional economic incentive to reduce emissions. Actions taken to comply with direct regulations reduce an entity’s compliance obligation under the Cap-and-Trade Regulation. So, for example, increased deployment of renewable electricity sources reduces a utility’s compliance obligation under the Cap-and-Trade Regulation.⁸

If California’s direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California’s direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. In other words, the Cap-and-Trade Program functions like an insurance policy for meeting California 2020’s GHG emissions reduction mandate:

The Cap-and-Trade Program establishes an overall limit on GHG emissions from most of the California economy—the “capped sectors.” Within the capped sectors, some of the reductions are being accomplished through direct regulations, such as improved building and appliance efficiency standards, the [Low Carbon Fuel Standard] LCFS, and the 33 percent [Renewables Portfolio Standard] RPS. Whatever additional reductions are needed to bring emissions within the cap is accomplished through price incentives posed by emissions allowance prices. Together, direct regulation and price incentives assure that emissions are brought down cost-effectively to the level of the overall cap.⁹

[T]he Cap-and-Trade Regulation provides assurance that California’s 2020 limit will be met because the regulation sets a firm limit on 85 percent of California’s GHG emissions.¹⁰

In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory architecture adopted by CARB under AB 32, the reductions

⁷ CARB, *First Update to the Climate Change Scoping Plan: Building on the Framework*, at 86 (May 2014) (emphasis added).

⁸ *Ibid.*

⁹ CARB, *First Update to the Climate Change Scoping Plan: Building on the Framework*, at 88 (May 2014)

¹⁰ *Id.* at 86-87.

attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures.

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported.¹¹ Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program.

The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period.¹² While the Cap-and-Trade Program technically covered fuel suppliers as early as 2012, they did not have a compliance obligation (i.e., they were not fully regulated) until 2015:

Suppliers of natural gas, suppliers of RBOB [Reformulated Gasoline Blendstock for Oxygenate Blending] and distillate fuel oils, suppliers of liquefied petroleum gas, and suppliers of liquefied natural gas specified in sections 95811(c), (d), (e), (f), and (g) that meet or exceed the annual threshold in section 95812(d) will have a compliance obligation beginning with the second compliance period.¹³

The Cap-and-Trade Program covers approximately 85 percent of California's GHG emissions.

The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported. The point of regulation for transportation fuels is when they are "supplied" (i.e., delivered into commerce). However, transportation fuels that are "supplied" in California, but can be demonstrated to have a final destination outside California, do not generate a compliance obligation. The underlying concept here is that CARB is seeking to capture tailpipe GHG emissions from the combustion of transportation fuels supplied to California end-users. Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with vehicle-miles traveled (VMT) are covered by the Cap-and-Trade Program.

2. **Page 4.6-8. Modify text in second paragraph and by revising "Draft" to "Adopted" General Plan and removing "January 2014":**

Local

Los Angeles County General Plan 2035

The ~~Draft-Adopted~~ County of Los Angeles General Plan 2035, ~~January 2014~~, provides the fundamental basis for the County's land use and development policy, and addresses all aspects of development including public health, land use, community character, transportation, economics, housing, air quality, and other topics. The

¹¹ 17 CCR § 95811(b).

¹² 17 CCR §§ 95811, 95812(d).

¹³ *Id.* at § 95851(b)(emphasis added).

General Plan sets forth objectives, policies, standards, and programs for land use and new development, circulation and public access, and service systems for the community as a whole. Measures related to GHG emissions that would be applicable to the Project are contained in the Los Angeles County General Plan 2035 Land Use, Air Quality, and Public Services and Utilities elements and are specified below. These measures will be implemented in connection with development of the Project. ~~Although the General Plan is only in draft format, and the~~ The Project is not subject to the ~~draft~~ Adopted General Plan goals and policies ~~that may change prior to adoption, the Project and~~ has been accounted for in regional population and transportation projections, ~~and As such,~~ it is concluded that the Project would be consistent with County greenhouse gas policies, ~~as drafted.~~

3. Page 4.6-10 and 4.6-11. Modify text in last paragraph and by deleting “Draft” CCAP:

Final Unincorporated Los Angeles County Climate Action Plan 2020

In July 2014, the County released the Final Unincorporated Los Angeles County Community Climate Action Plan 2020 (CCAP), ~~which was adopted in August 2015,~~ to reduce the County’s contribution to climate change impacts.¹⁴ The County has set a target to reduce GHG emissions from community activities in the unincorporated areas of Los Angeles County by at least 11 percent below 2010 levels by 2020. There is no specific numerical goal for new development projects. The CCAP describes the County’s plan for achieving this goal, including specific strategy areas for each of the major emissions sectors and provides details on 2010 and projected 2020 emissions in the unincorporated areas. The CCAP is a component of the Los Angeles County General Plan.

The CCAP analyzes specific actions that result in reduced emissions and lays out a plan for their use and implementation. It provides a mechanism for tracking and evaluating the County’s progress and promotes development that is consistent with and supportive of the goals and policies of the General Plan. The CCAP also supports sustainable design and energy efficiency, as well as active and multi-modal transportation strategies to reduce VMT. Implementation of the measures in the CCAP would avoid the generation of more than 1.9 MMTCO_{2e}. Applicable strategies of the CCAP relevant to the Project are specified below. ~~Although the CCAP is in draft form, and the CCAP does not apply to the Project because the CCAP has not yet been adopted by the County, t~~The following ~~draft~~ CCAP measures will be implemented in connection with development of the Project:

4. Page 4.6-11. Include the following text:

The CCAP is a resource for the unincorporated areas of the County. Public agencies and private developers can also use the CCAP to comply with project-level review requirements pursuant to CEQA. CEQA Guidelines specify that CEQA project evaluation of GHG emissions can “tier off” a programmatic analysis of GHG emissions, provided that the programmatic analysis (or climate action plan) does the following (CEQA Guidelines Section 15183.5):

- Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area.

¹⁴ County of Los Angeles, Department of Regional Planning, *Final Unincorporated Los Angeles County Community Climate Action Plan, July 2014*. http://planning.lacounty.gov/assets/upl/project/ccap_draft-201407.pdf. Accessed August 2014.

- Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable.
- Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area.
- Specify measures or a group of measures, including performance standards that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level.
- Monitor the plan's progress.
- Adopt the GHG Reduction Strategy in a public process following environmental review.

The CCAP meets CEQA Guidelines Section 15183.5 listed above by: (1) quantifying all primary sectors of GHG emissions within the unincorporated areas for 2010 and 2020; (2) including a reduction target of at least 11 percent below 2010 levels, which is consistent with the recommendations in the AB 32 Scoping Plan for municipalities to support the overall AB 32 reduction targets; (3) analyzing community emissions for the unincorporated areas as a whole and including predicted growth expected by 2020; (4) including specific measures to achieve the overall reduction target; (5) including periodic monitoring of plan progress; and (6) submitting the CCAP to be adopted in a public process following compliance with CEQA.

5. Page 4.6-17. Include the following text:

Section 15064.7 of the *State CEQA Guidelines* defines a threshold of significance as an identifiable quantitative, qualitative, or performance level of a particular environmental effect, compliance with which determines the level of impact significance. CEQA gives wide latitude to lead agencies in determining what impacts are significant and does not prescribe thresholds of significance, analytical methodologies, or specific mitigation measures. CEQA leaves the determination of significance to the reasonable discretion of the lead agency and encourages lead agencies to develop and publish thresholds of significance to use in determining the significance of environmental effects. As discussed previously, the CEQA Guidelines specify that CEQA project evaluation of GHG emissions can “tier off” a programmatic analysis of GHG emissions, provided that the programmatic analysis (or climate action plan) meets the requirements listed in CEQA Guidelines Section 15183.5. The County CCAP meets the requirements of CEQA Guidelines Section 15183.5.

6. Page 4.6-18. Modify text in second paragraph and by revising “Draft” to “Adopted” CCAP:

Greenhouse Gas Emission Thresholds (GHG-1)

The *State CEQA Guidelines* do not provide numeric or qualitative thresholds of significance for GHG emissions. However, AB 32 requires GHGs emitted in California to be reduced to 1990 levels by 2020 and 80% below 1990 levels by 2050. The Technical Advisory on CEQA and Climate Change from OPR suggests that, in absence of regulatory guidance or standards, lead agencies, such as the County, must undertake project-by-project analyses consistent with available guidance and current CEQA practice to ascertain project impacts under CEQA. In the latest *State CEQA Guidelines* amendments, which went into effect on March 18, 2010, OPR encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. The County has prepared a Draft an Adopted CCAP which meets *State CEQA Guidelines* Section 15183.5 by: 1) quantifying all primary sectors of GHG emissions within the unincorporated areas for 2010 and 2020; 2) including a reduction target of at least

11% below 2010 levels, which is consistent with the recommendations in the AB 32 Scoping Plan for municipalities to support the overall AB 32 reduction targets; 3) analyzing community emissions for the unincorporated areas as a whole, including predicted growth expected by 2020; 4) including specific measures to achieve the overall reduction target; 5) including periodic monitoring of plan progress; and 6) submitting the CCAP to be adopted in a public process following compliance with CEQA.¹⁵ Therefore, the Project is evaluated for consistency with: 1) the CCAP; and 2) the state goal of reducing GHG emissions in California to 1990 levels by 2020, as set forth by the timetable established in AB 32.

7. Page 4.6-19. Include the following text in the first paragraph:

The SCAQMD released a draft guidance document regarding interim CEQA GHG significance thresholds in October 2008. SCAQMD proposed a tiered approach, whereby the level of detail and refinement needed to determine significance increases with a project's total GHG emissions. SCAQMD proposed a screening level of 3,000 MTCO_{2e} per year for all land use projects, under which project impacts are considered "less than significant." The 3,000 metric ton screening level was intended "to achieve the same policy objective of capturing 90 percent of the GHG emissions from new mixed-use or all land use development projects in the residential/commercial sectors."¹⁶ In CAPCOA's January 2008 CEQA and Climate Change white paper, CAPCOA suggested a possible quantitative threshold option that would capture 90 percent of GHG emissions from future discretionary development projects. According to CAPCOA, the "objective was to set the emission threshold low enough to capture a substantial fraction of future residential and nonresidential development that will be constructed to accommodate future statewide population and job growth, while setting the emission threshold high enough to exclude small development projects that will contribute a relatively small fraction of the cumulative statewide GHG emissions."¹⁷ A 90 percent capture rate would "exclude the smallest proposed developments from potentially burdensome requirements ... to mitigate GHG emissions."¹⁸ The SCAQMD's screening level of 3,000 metric tons per year is a South Coast Air Basin-specific level that would meet CAPCOA's intent for the suggested quantitative threshold option. For projects with GHG emissions increases greater than 3,000 MTCO_{2e} per year, the use of a percent emission reduction target was proposed to determine significance. This emission reduction target is a reduction below what is considered "business as usual." SCAQMD also proposes that projects amortize construction emissions over the lifetime of any given project, typically, but not always, defined as 30 years. Project construction emissions can be amortized by calculating total construction period emissions and dividing by the presumed lifetime of the Project. Because the County does not have a specific quantitative threshold, the SCAQMD threshold of 3,000 MTCO_{2e} per year will be used for determining significance for the Project with respect to GHG-1, based on past County practice.

¹⁵ *Final Unincorporated Los Angeles County Community Climate Action Plan, County of Los Angeles, Department of Regional Planning, July 2014. http://planning.lacounty.gov/assets/upl/project/ccap_draft-201407.pdf. Accessed August 2014.*

¹⁶ *SCAQMD, Board Meeting, December 5, 2008, Agenda No. 31, Interim GHG Significance Threshold Proposal – Key Issues/Comments Attachment D.*

¹⁷ *California Air Pollution Control Officer's Association, CEQA and Climate Change, (2008) 42-43.*

¹⁸ *California Air Pollution Control Officer's Association, CEQA and Climate Change, (2008) 43-44.*

8. Page 4.6-19. Modify text in second paragraph and by revising “Draft” to “Adopted” CCAP:

Greenhouse Gas Plan (GHG-2)

The significance of the Project’s GHG emissions are determined by evaluating the consistency of the Project with applicable GHG reduction strategies and local actions in the County of Los Angeles CCAP. As discussed previously, the CCAP meets CEQA Guidelines Section 15183.5, which means that project-specific environmental documents that incorporate applicable CCAP actions may “tier off” the EIR certified for the County General Plan and CCAP to meet project-level CEQA evaluation requirements for GHG emissions. Projects that demonstrate consistency with applicable CCAP actions can be determined to have a less than significant cumulative impact on GHG emissions and climate change (notwithstanding substantial evidence that warrants a more detailed review of project-level GHG emissions).

In addition, if ~~If~~ a project implements design and operational strategies consistent with an applicable GHG reduction policy (i.e., Adopted Los Angeles County General Plan 2035, Santa Clarita Valley Area Plan (“One Valley, One Vision”) 2012, and Adopted Final Unincorporated Los Angeles County Climate Action Plan 2020), it is considered to have a less than significant impact with respect to its contribution to the cumulative impact of global climate change. ~~Although the Los Angeles County General Plan 2035 and CCAP have yet to be adopted, and the Project is not subject to the 2012 “One Valley, One Vision” Plan, these policies are the most appropriate, due to a lack of other applicable GHG reduction policy documents. These CCAP criteria are consistent with the Appendix G draft amendments discussed above and will be used for determining significance for the Project with respect to GHG-2.~~

9. Page 4.6-19. Include the following text:

Methodology

The evaluation of potential impacts to GHG emissions that may result from the construction and long-term operations of the Project has been conducted as described below. For the purposes of this EIR, total GHG emissions from the Project were quantified to determine whether the associated emissions would substantially help or hinder the State’s ability to attain the goals identified in AB 32 (i.e., reduction of statewide GHG emissions to 1990 levels by 2020). As stated above, the mandate of AB 32 demonstrates California’s commitment to reducing GHG emissions and the state’s associated contribution to climate change, without intending to limit population or economic growth within the state.

10. Page 4.6-20. Include the following text:

Greenhouse Gas Reduction Plan

If a project implements design and operational strategies consistent with an applicable GHG reduction policy, it is considered to have a less than significant impact with respect to its contribution to the cumulative impact of global climate change. These criteria are consistent with Appendix G of the State CEQA Guidelines and will be used for determining significance for the Project with respect to GHG reduction plans.

In response to the CALGreen code, the County adopted Title 31 of the County’s Code of Ordinances (the Los Angeles County Green Building Standards Code) in November 2013, which adopts by reference the CALGreen code except as changed or modified in Title 31. The County Department of Regional Planning is

working on an ordinance to repeal the Green Building and Drought Tolerant Landscaping requirements from Title 22 (Planning and Zoning Code). Additionally, the ordinance will update the Green Building Program’s tree requirements in order to increase shade to sidewalks and parking lots for human comfort, and to shade buildings to conserve energy used for air conditioning. In addition, the County of Los Angeles General Plan and Santa Clarita Valley Area Plan (“One Valley, One Vision” Plan) provide recommendations for specific emission reduction strategies for reducing GHG emissions. Thus, if the project is designed in accordance with these policies and regulations, it would result in a less than significant impact, since it would be consistent with the overarching local and regional plans and regulations for reducing GHG emissions.

11. Page 4.6-26. Modify text in second paragraph and Table 4.6-4 by revising “Draft” to “Adopted” General Plan:

The County’s ~~Draft~~ Adopted General Plan and 2012 Santa Clarita Valley Area Plan contain goals, objectives, and policies that are relevant to GHG emissions reduction.

Table 4.6-~~4~~³

Project Consistency with County of Los Angeles ~~Draft~~ Adopted General Plan and Santa Clarita Valley Area Plan (“One Valley, One Vision” Plan)

Policy	Consistency Analysis
<u>Draft</u> <u>Adopted</u> General Plan Air Quality Element	
Policy AQ 3.1: Facilitate the implementation and maintenance of the Community Climate Action Plan to ensure that the County reaches its climate change and greenhouse gas emission reduction goals.	Consistent. As discussed above and shown in the table below, the Project is consistent with the CCAP and will not interfere with the County attaining its climate change and GHG emission reduction goals.

12. Page 4.6-28. Modify text in first paragraph:

Community Climate Action Plan

The CCAP, which serves as the County’s policy document for GHG emissions reductions, is still a draft document. However, the Board of Supervisors indicated its intent to approve the CCAP, in its current form, at its meeting of March 24, 2015, although a final consent date has not been set. The Adopted CCAP includes specific strategy areas for each of the major emissions sectors, and provides details on the 2010 and projected 2020 emissions in the unincorporated areas. The CCAP is a component of the Los Angeles County General Plan. The actions in the CCAP are priority actions and intended for near-term implementation, such that the County can achieve its GHG reduction goal for 2020 for the unincorporated areas of the County. As discussed below in **Table 4.6-5, Project Consistency with the Community Climate Action Plan**, the Project would be consistent with the relevant and applicable goals and policies of the CCAP pertaining to GHGs.

13. Page 4.6-28. Modify Table numbering:Table 4.6-~~54~~**Project Consistency with Community Climate Action Plan ^a****14. Page 4.6-29. Modify text in Table 4.6-5:**

LUT-6: Land Use Design and Density: Promotes sustainability in land use design including diversity of urban and suburban developments.	Consistent: The Project would be consistent with the growth outlined in the “One Valley, One Vision” plan and would therefore consistent with land use design policies.
<u>LUT-7: Transportation Signal Synchronization Program:</u> Improve the network of traffic signals on the major streets throughout LA County.	Consistent: The Project’s traffic impact analysis, <i>Aidlin Hills VTTM 52796 Traffic Impact Analysis (2014)</i> , includes an impact assessment of Project traffic. Details of the analysis are provided in Section 4.12, Traffic/Transportation, and in Appendix K of the Draft EIR. Required improvements to the network of roadways, turn lanes, and traffic signals in the Project area would be made in accordance with the findings and recommendations of the traffic impact analysis.
<u>LUT-8: Electric Vehicle Infrastructure:</u> Install 500 electric vehicle (EV) charging facilities at County-owned public venues (e.g., hospitals, beaches, stand-alone parking facilities, cultural institutions, and other facilities) and ensure that at least one-third of these charging stations will be available for visitor use.	Consistent. The Project is not a County-owned public venue; therefore, this strategy does not apply to the Project. However, the Project would include pre-installation or installation of electric vehicle supply equipment for dwelling units pursuant to CALGreen Appendix A4 (Residential Voluntary Measures). Thus, the Project would be consistent with this strategy. The Project would also not conflict with or impede the County’s ability to implement this strategy for County-owned public venues.
LUT-9: Idling Reduction Goal: Encourage idling limits of 3 minutes for heavy-duty construction equipment, as feasible within manufacturer’s specifications	Consistent. The Project would adhere to idling limitations consistent with CARB requirements.
<u>Water Conservation and Wastewater</u>	
<u>WAW-1: Per Capita Water Use Reduction Goal:</u> Meet the State established per capita water use reduction goal as identified by Senate Bill (SB) X7-7 for 2020. (The State goal is a 20 percent reduction in per capita water use compared to baseline levels.).	Consistent. As stated in PDF 6-7, the Project would reduce water usage and demand by installing water efficient fixtures such as faucets, showerheads, and toilets meeting or exceeding the USEPA WaterSense® or equivalent standards. In addition, fire-retardant, drought-tolerant, and native landscaping would be used in public common areas to reduce water consumption. On-site reductions in water use would reduce the amount of energy necessary to transport the water to the site, and thus reduce the Project’s water-related energy demand and associated emissions.
Waste Reduction, Reuse, and Recycling Element	
SW-1: Waste Diversion Goal: Adopt a waste diversion goal to comply with all state mandates to divert at least 75 percent of waste (construction and operation) from landfill disposal by 2020.	Consistent. The Project would comply with applicable provisions of the County’s Green Building Program to reduce resource consumption. The Project would also recycle, reuse, and/or divert 70 percent of non-hazardous construction waste.

15. Page 4.6-30. Modify text in Table 4.6-5:

LC-2: Create New Vegetated Open Space: Restore and revegetate previously disturbed land and/or unused urban and suburban areas.

Consistent. The Project would incorporate residential landscaping that shall comply with the County’s Tree Planting ordinance (Section 22.52.2130(C)(5)). The ordinance requires that each lot containing a single-family residence contain a minimum of two 15-gallon trees, at least one of which shall be from the drought-tolerant plant list. The Project would require the removal of one Coast Live Oak (non-Heritage) but would not impact or endanger the health of the remaining 14 Coast Live Oaks, including the Heritage Oak, on the Project site. Preservation guidelines and mitigation measures would be established for the 14 Coast Live Oaks that would remain on the Project site by placing protecting fencing during Project construction. In order to offset the removal of the one Coast Live Oak, a minimum of two, 15-gallon replacement trees to be planted on the Project site. Additionally, the Project includes a landscape plan that utilizes a plant palette consisting of fire retardant plants, native and appropriate non-native drought tolerant species. Drought-tolerant, native landscaping would be used in public common areas to reduce water consumption.

LC-4: Protect Conservation Areas: Encourages protection of current natural areas.

Consistent. The Project would include the preservation of approximately 165 acres of undeveloped, natural area within the southern and western portions of the Project site. The Project would incorporate an open space linkage between Pico Creek and Upper Wickham Canyon after realignment of Wickham Canyon. The Canyon would be planted with additional native trees and shrubs.

^a Final Unincorporated Los Angeles County Community Climate Action Plan, County of Los Angeles, Department of Regional Planning, July 2014. http://planning.lacounty.gov/assets/upl/project/ccap_draft-201407.pdf. Accessed August 2014.

Source: PCR Services Corporation (2014); County of Los Angeles Final Unincorporated Los Angeles County Community Climate Action Plan (2014~~6~~).

16. Page 4.6-32. Modify text in Table 4.6-6:**Los Angeles County
Green Building
Ordinance**

Install a smart irrigation controller and require 65 percent of the landscaped area to use drought-tolerant plant species.

Consistent. The Project would meet this requirement as part of its compliance with the County's requirements, the CALGreen Code, and the USGBC LEED® Silver certification.

Achieve 65 percent waste diversion for construction waste.

Consistent. The Project would exceed this requirement as part of its compliance with the County's requirements, the CALGreen Code, and the USGBC LEED® Silver Certification process to recycle or reuse 75 percent of nonhazardous construction and demolition debris or minimize the generation of construction waste to 2.5 pounds per square foot of building floor area. The Project would provide areas for the collection of recyclable materials on the Project Site.

Minimum of one 15-gallon tree must be planned for every 10,000 feet of developed area.

Consistent. The Project would meet this requirement as part of its compliance with the County's requirements.

Install high efficiency toilets

Consistent. The Project would exceed this requirement as part of its compliance with the County's requirements, the CALGreen Code, and the USGBC LEED® Silver Certification process and reduce indoor water usage by a minimum of 35 percent.

**Los Angeles County
Low Impact
Development (LID)
Standards**

All Designated Projects (required) must retain 100 percent of Stormwater Design Volume on-site through infiltration, evapotranspiration, stormwater runoff harvest, or a combination thereof.

Consistent. The Project would implement stormwater BMPs consistent with the County's requirements.

Source: PCR Services Corporation, 20146

17. Page 4.6-33. Modify text in the last paragraph:

Nonetheless, as discussed previously under the analysis of Project impacts, the Project would be consistent with the State's goals, resulting in a GHG emission profile that is below the most stringent thresholds, and includes implementation of the mandatory and many optional GHG-reducing strategies. Additionally, the overwhelming majority of the Project-related GHG emissions, from source sectors that include electricity generated in-state or imported and combustion of transportation fuels, are covered-entities under the Cap-and-Trade Program and would be reduced sector-wide in accordance with the goals of AB 32. This is in addition to the previously discussed GHG emissions reductions from the Project-specific energy efficiency design features. Therefore, the Project would not contribute considerably to cumulatively significant global climate change and impacts would be less than significant. As such, no mitigation is required.

Section 4.7 – Hazards and Hazardous Materials

- 1. Page 4.7-20. Modify text in last paragraph by revising “Draft” to “Adopted” General Plan and removing “(Draft 2014)”:**

The Project site is located within Fire Zone 4, which is a VHFHSZ; refer to Figure 12.6, *Fire Hazard Severity Zones Policy Map*, of the Adopted General Plan 2035 (~~Draft 2014~~) and Exhibit S-6, *Very High Fire Hazard Severity Zones*, of the Santa Clarita Valley Area Plan 2012¹⁹. A VHFHSZ typically has the following vegetative types or is adjacent to such communities: chaparral, coastal sage, annual grasslands, riparian, and oak woodlands. Wildland fires are relatively common occurrences in these plant communities, which are found in the Santa Clarita Valley and surrounding area. These plant communities pose a threat to expanding urban development due to their high combustibility and their dense biomass.

- 2. Page 4.7-28. Modify text in last paragraph by revising “Draft” to “Adopted” General Plan and removing “(Draft 2014)”:**

The Project site is primarily vacant and undeveloped. Pico Canyon Road generally traverses the northern boundary of the Project site, with a small portion of the roadway segment occurring in the northeast corner of the site. According to Figure 12.7, *Disaster Routes*, of the Adopted General Plan 2035 (~~Draft 2014~~), the nearest disaster route to the Project site is I-5, located approximately 1.6 miles east of the Project site. Implementation of the Project would not result in the closure of I-5 or any streets designated as an evacuation route in an adopted emergency response or evacuation plan. Construction activities and staging areas would be confined to the Project site. The construction activities would not physically impair access to and around the Project site. Furthermore, development of the Project would comply with County’s building and applicable fire and safety codes, which would require adequate access for fire personnel and equipment in and out of the Project site. Therefore, impacts would be less than significant.

Section 4.8 – Hydrology and Water Quality

- 1. Page 4.8-30. Modify text in first, second, and last paragraph by revising “Draft” to “Adopted” General Plan and removing “(Draft 2014)”:**

According to Figure 12.2, *Flood Hazard Zones Policy Map*, of the Adopted General Plan 2035 (~~Draft 2014~~) and Exhibit S-4, *Floodplains*, of the Santa Clarita Valley Area Plan 2012, a portion of the Project site within and adjacent to Pico Canyon is located within a 100-year flood hazard area.²⁰ The 1990 Santa Clarita Valley Area Plan designates floodplains as Floodplain Management Areas with residential uses precluded from floodways. However, the Project would not place housing within the 100-year floodplain. The Project would place only infrastructure designed for flood management within the 100-year floodplain, which would be constructed to control storm flows and minimize flood-related hazards. Thus, less than significant impact would occur with regard to flood flows.

¹⁹ The Los Angeles County 1990 Santa Clarita Valley Area Plan referred to the County General Plan Safety Element, *The Wildland and Urban Fire Hazards Map depicting Fire Zone 4 for designation of fire hazard locations*.

²⁰ *Flood Insurance Rate Map 060370815F*. Federal Emergency Management Agency. September 26, 2008.

Also, no dams or levees are present on or near the Project site. According to Figure 12.4, *Dam and Reservoir Inundation Areas*, of the Adopted General Plan 2035 (~~Draft 2014~~), the Project site is not located within a flood hazard area due to failure of a dam or reservoir. Therefore, flooding resulting from a dam or levee failure would not occur.

The Project site is located approximately 24 miles northeast of the Pacific Ocean. The site is not adjacent to a large body of water. According to Figure 12.3, *Tsunami Hazard Areas*, of the Adopted General Plan 2035 (~~Draft 2014~~), the Project site is not located within a tsunami hazard area.

Section 4.9 – Land Use and Planning

1. Page 4.9-1. Modify text in first paragraph and by revising “Draft” to “Adopted” General Plan and removing “(2014)”:

Development on the Project site is guided by policies and regulations set forth in local and regional plans as well as local zoning regulations. This section provides an analysis of applicable land use plans and zoning regulations and evaluates the relationship between the Project and surrounding land uses. The analysis addresses whether the Project would conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project. Information in this section is based the adopted Los Angeles County (County) General Plan (1980), the Adopted ~~Draft~~ Los Angeles County General Plan 2035 (2014~~5~~), the 1990 Santa Clarita Valley Area Plan, the Santa Clarita Valley Area Plan (“One Valley, One Vision”) (2012), Los Angeles County Code Title 22, and Southern California Association of Governments (SCAG)’s 2012-2035 Regional Transportation Plan Sustainable Communities Strategy (RTP/SCS). ~~The Los Angeles County General Plan 2035 (2014) is only in draft format; as such, the Project is not required to comply with the goals and policies of this draft General Plan, which may change prior to adoption.~~ Further, as the Project was originally submitted prior to the 2012 adoption of the “One Valley, One Vision” area plan, the Project site will be analyzed under the land use categories that existed at the time of the original application, which are contained in the 1990 Santa Clarita Valley Area Plan.

2. Page 4.9-2. Modify text in first and second paragraph by revising “Draft” to “Adopted” General Plan and removing “(2014)”:

...growth and distribution; protection of life and property; environmental resource protection; major open space and recreational opportunities; economic, housing, and social opportunities; regional transportation and service systems, and land use policy. General Plan elements, which have been updated over the years, address land use, housing, transportation, water and waste management, safety, seismic safety, noise, scenic highways, bikeways and recreation. Because of the age of the adopted General Plan, the elements and goals of the ~~Draft~~ Adopted Los Angeles County General Plan 2035 are evaluated in this Draft EIR with respect to the more recent plan’s overall land use policy and intent. However, the designated land uses under the adopted General Plan would still be applicable to the Project site.

~~Draft~~ Adopted Los Angeles County General Plan 2035 (2014~~5~~)

The ~~Draft~~ Adopted Los Angeles County General Plan 2035 (2014~~5~~) represents a comprehensive effort to update the County’s 1980 General Plan and provides the policy framework for how and where the unincorporated areas will grow through the year 2035. This Plan establishes goals, policies, and programs to

foster healthy, livable, and sustainable communities. Guiding Principles of the ~~Draft~~ Adopted Los Angeles County General Plan emphasize the concept of sustainability. These are...

3. Page 4.9-3. Modify text in the second paragraph by revising “Draft” to “Adopted” General Plan:

The ~~Draft~~ Adopted General Plan identifies 11 Planning Areas, with the Project site being located in the Santa Clarita Valley Planning Area, and provides a mechanism for local communities to work with the County to develop plans that respond to their unique and diverse character. In addition, the ~~Draft~~ Adopted General Plan comprises the following nine elements:

4. Page 4.9-16. Modify text in the first paragraph by revising “Draft” to “Adopted” General Plan and removing “(2014)”:

...Element of the adopted Los Angeles General Plan and the policies of the Land Use Chapter of the ~~Draft~~ Adopted Los Angeles County General Plan 2035 (~~2014~~) to determine the approximate consistency of the Project with current land use policies.

5. Page 4.9-17. Modify text in the last paragraph by removing “Draft” to “Adopted” General Plan and removing “(2014)” and updating the General Plan information:

Los Angeles County ~~Draft~~ Adopted General Plan 2035

~~The Los Angeles County General Plan 2035 (2014) is only in draft format; as such, the Project is not required to comply with the goals and policies of this draft General Plan that may change prior to adoption. The Project is compared to the applicable policies of the ~~Draft~~ Adopted General Plan in **Table 4.9-1, Comparison of the Project to Applicable Policies of the ~~Draft~~ Adopted Los Angeles County General Plan 2035.** In particular, the Project would be consistent with the General Plan as follows:~~

Table 4.9-1

**Comparison of the Project to Applicable Policies
of the ~~Draft~~ Adopted Los Angeles County General Plan 2035**

Section 4.10 – Noise

1. Page 4.10-20. Modify text in the second paragraph as follows in order to reference updated data:

As discussed in Chapter 2.0, Project Description, of this Draft EIR, the Project construction is conceptually anticipated to commence in ~~November 2015~~ September 2016 and conclude in July 2019 with grading operations anticipated to commence in ~~November 2015~~ September 2016 and conclude in ~~June 2016~~ February 2017. Infrastructure installation would commence in ~~May~~ December 2016, starting with storm drains (about four months) and followed by sewer (about six months), water (about six months), street hardscape (about two months), and other utilities (about four months).

Section 4.11 – Public Services

- 1. Page 4.11-1. Modify text in the first paragraph by revising “Draft” to “Adopted” General Plan and removing “(2014)”:**

This section analyzes potential impacts of the Project on public services including fire protection, sheriff protection, schools, parks, and libraries that would serve the Project. Relevant regulations and existing conditions are described as well as the potential for the Project to have impacts on public service facilities and the ability of the service providers to provide or maintain adequate services with implementation of the Project. Information in this section is based on correspondence with the Los Angeles County Fire Department (LACFD), the Los Angeles Sheriff’s Department (LASD), the Newhall School District (NSD), and the Los Angeles County Public Library (LACPL), as well as information provided in the LACFD Strategic Plan (2012), the LACFD Developer Fee Detailed Fire Station Plan (2013), and the ~~Draft~~ Adopted General Plan 2035 ~~(2014)~~. Letters of correspondence with these agencies are located in Appendix J of this EIR.

- 2. Page 4.11-5. Modify text in the first paragraph by revising “Draft” to “Adopted” General Plan and removing “(2014)”:**

Los Angeles County ~~Draft~~ Adopted General Plan 2035 ~~(2014)~~

Chapter 10, Parks and Recreation Element

The purpose of the Parks and Recreation Element is to plan and provide for an integrated parks and recreation system that meets the needs of residents. The goals and policies set forth in the Element address the growing and diverse recreation needs of the communities served by the County.

- 3. Page 4.11-6. Modify text in the first and last paragraph as follows in order to reference updated data:**

The LACFD personnel includes ~~four~~ three emergency support teams, two urban search and rescue task forces, three hazardous materials task forces, and a 210-member California Task Force 2 for national and international deployment.

During ~~2014~~ 2015, the Fire Station responded to ~~39~~ 29 fire incidents, ~~1,598~~ 1,717 medical incidents, and ~~285~~ 309 other/miscellaneous incidents for a total of ~~1,922~~ 2,055 emergency incidents with an average emergency response time of five minutes and ~~46~~ 48 seconds (5:~~46~~ 48 minutes).

- 4. Page 4.11-7. Modify text in the second paragraph as follows in order to reference updated data:**

There are no planned LACFD improvements in the immediate area of the Project site. However, the LACFD Developer Fee Detailed Fire Station Plan identifies one replacement station for temporary Fire Station 104 and ~~six~~ nine additional fire stations within the Santa Clarita Valley.

5. Page 4.11-7. Modify text in the fourth paragraph as follows in order to reference updated data:

The Project site is located within the Santa Clarita Valley service area. The Santa Clarita Sheriff Station (Sheriff Station), located at 23740 Magic Mountain Parkway, Valencia, is the primary law enforcement service provider to the Project site. The Sheriff Station is located approximately 3.5 miles northeast of the Project site. The Station's service area encompasses approximately 656 square miles and includes the City of Santa Clarita and unincorporated County territory between the City of Los Angeles to the south, the Kern County line to the north, the Ventura County line to the west, and the community of Agua Dulce to the east. As of July 2015, the estimated resident population of the Sheriff Station's service area is ~~270,000~~ 279,000 persons. The Sheriff Station is currently staffed by ~~189~~ 200 sworn deputies and ~~38~~ 43 civilian employees. The service ratio for the Sheriff Station is one deputy per 1,395 persons (i.e., 0.72 deputies per 1,000 persons) (most recent data July 2015).²¹ The Sheriff Station provides 24-hour field deployment via multiple shifts, utilizing patrol cars, helicopters, emergency operations personnel, search and rescue personnel, and a mounted posse. The Sheriff Station currently deploys one to two patrol cars per shift to the Project area.

6. Page 4.11-10. Modify text in the last paragraph by revising "Draft" to "Adopted" General Plan and removing "(2014)":

The analysis evaluates the potential for impacts on public services and facilities that would serve the Project. The methodology for this analysis included corresponding with the various public service agencies and providers with jurisdiction over the Project area to request current information regarding service ratios, response times, performance objectives, available equipment and facilities. In addition, available information from LACFD Strategic Plan (2012), the LACFD Developer Fee Detailed Fire Station Plan (2013), and the ~~Draft~~ Adopted General Plan 2035 (~~2014~~), as well as the websites for each the service agencies, were reviewed for background information. Based on the addition of the Project and its anticipated associated number of residents, in consideration of existing service conditions, the analysis makes a determination as to whether the Project would adversely affect the ability of the service providers to maintain or provide acceptable service to their designated service area (including the Project area) and whether new or physically altered facilities would be required.

7. Page 4.11-13. Modify text in the last paragraph as follows in order to reference updated data:

As discussed in the Existing Conditions above, the closest LASD sheriff station that would provide primary sheriff protection services to the Project site is the Santa Clarita Sheriff Station. The Sheriff Station is located approximately 3.5 miles northeast of the Project site. The Project would generate a population of approximately 306 residents. This incremental increase in population, compared to the estimated resident population of ~~270,000~~ 279,000 persons within the Sheriff Station's service area, would not create a need for expanding existing facilities or staff, construction of a new facility, or adversely impact types of services provided.

²¹ *Roosevelt Johnson, Captain of the Santa Clarita Valley Sheriff's Station, LASD, Letter Correspondence, dated March 6, 2014 and January 19, 2016.*

Section 4.12 – Traffic/Transportation

1. Page 4.12-3. Modify text in fourth paragraph by revising “Draft” to “Adopted” General Plan and removing “(2014)”:

Los Angeles County Draft Adopted General Plan 2035 (2014)

Chapter 7, Mobility Element

The Mobility Element provides an overview of the transportation infrastructure and strategies for developing an efficient and multimodal transportation network. The Element assesses the challenges and constraints of the County transportation system and offers policy guidance to reach the County’s long-term mobility goals. The Element includes two sub-elements, the Highway Plan and the Bicycle Master Plan. These plans establish policies for the roadway and bikeway systems in the unincorporated areas, which are coordinated with the networks in the 88 cities in the County. The General Plan also established a program to prepare community pedestrian plans, with guidelines and standards to promote walkability and connectivity throughout the unincorporated areas.

2. Page 4.12-22. Modify text in Mitigation Measure 4.12-1 as follows:

Mitigation Measures

Refer to Mitigation Measures 4.11-1 and 4.11-4 in Section 4.11, *Public Services*, in this EIR. The following mitigation measure is also prescribed.

Mitigation Measure 4.12-1 Prior to the issuance of an encroachment permit within the public right-of-way, the Permittee, in coordination with the Los Angeles County DPW, shall devise a Traffic Control Plan to be implemented during construction of the Project. The Traffic Control Plan shall identify all traffic control measures, signs, and delineators to be implemented by the construction contractor through the duration of construction activities associated with the Project improvements for Pico Canyon Road. Further, the Traffic Control Plan would include provisions for the construction contractor to transport large-size trucks during off-peak hour commute periods. The Traffic Control Plan shall be subject to final approval by the Los Angeles County DPW.

Section 6.0 – Other Mandatory CEQA Considerations

1. Page 6-12. Modify text regarding mitigation measures in the last paragraph:

Mitigation Measures 4.3-1 through 4.3-~~6~~12 relate to biological resources. Mitigation Measure 4.3-1 requires recovery and transplantation of sensitive plant species. Mitigation Measure 4.3-2 requires avoidance of direct impacts to sensitive wildlife species by dedication of open space. Mitigation Measures 4.3-4 through 4.3-8 requires pre-construction monitoring to avoid direct mortality of a suite of special-status wildlife species. Mitigation Measure 4.3-~~3~~9 requires restoration or enhancement of sensitive plant communities. Mitigation Measure 4.3-~~4~~10 requires compliance with jurisdictional regulatory permitting through the CDFW, USACE and RWQCB. Mitigation Measure 4.3-~~5~~11 provides avoidance of direct impacts to nesting birds. Mitigation Measure 4.3-~~6~~12 requires the replacement of two oak trees for the authorization to remove on mature oak tree. Implementation of Mitigation Measures 4.3-1 through 4.3-~~6~~12 would not result in adverse secondary impacts.

2. Page 6-15. Modify text in the last paragraph by revising “Draft” to “Adopted” General Plan and removing “(Draft 2014)”:

The Project site and most surrounding areas do not contain agricultural uses or related operations; refer to Figure 9.5, Agricultural Resource Areas Policy Map, of the Adopted General Plan 2035 (~~Draft 2014~~). The Project site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. No impact would occur in this regard.

3. Page 6-17. Modify text in the second and third paragraph by revising “Draft” to “Adopted” and removing “(2014)” and “(Draft 2014)”:

The Project site is not located within a known mineral resource area, and no mineral resources are known on the Project site; refer to Figure 9.6, Natural Resource Areas, of the Adopted County General Plan 2035 (~~Draft 2014~~) and Exhibit CO-2, Mineral Resources, of the Santa Clarita Valley Area Plan 2012. There has been no mineral extraction (petroleum) on the Project site for nearly 100 years and there are no current plans for new extraction in the area. The updated Phase I (2014) archaeological report found petroleum staining and odors located west of Wickham Canyon in apparently disturbed soil, as also reported in the 1999 Phase I ESA. The lateral extent of the stained and odorous soil appeared to be 400 square feet in size and surficial in nature. Given the apparent limited extent of the impact soil, this area is not considered to be a significant environmental concern. Such soil can be removed from the Project site during the course of future grading activities for the Project. Therefore, impacts would be less than significant.

The Project site is not located within a Mineral Resource Zone and there are no known designated locally-important mineral resources located on the Project site or in the vicinity of the Project site (refer to Figure 9.6, Natural Resource Areas, of the Adopted County General Plan 2035 [~~Draft 2014~~] and Exhibit CO-2, Mineral Resources, of the Santa Clarita Valley Area Plan 2012). Therefore, no impact to mineral resources would occur.

4. Page 6-18. Modify text in the last paragraph by revising “Draft” to “Adopted” General Plan and removing “(Draft 2014)”:

According to the Adopted County General Plan 2035 (~~Draft 2014~~), Chapter 10, Parks and Recreation Element, large areas of the County are underserved by parks and recreational facilities. The Element shows that the unincorporated areas of the County face a significant deficit in local parkland of 3,620 acres. Based on population projections, the unincorporated areas of the County would have deficits of 5,986 acres in local parkland and 5,046 acres in regional parkland by the year 2035 if no new parks are created. The Santa Clarita Valley Area Plan contains over 14,000 acres of parkland, including both local and regional parks

5. Page 6-20. Modify text in the first paragraph as follows in order to reference updated data:

The Project site is within the jurisdiction of the Sanitation Districts of Los Angeles County and LARWQCB. Wastewater produced in the area is currently transported to, and treated at the Saugus Water Reclamation Plant (“WRP”) and the Valencia WRP, which are operated by the Sanitation District pursuant to LARWQCB

requirements; refer to Exhibit CO-3, Water Resources, of the Santa Clarita Valley Area Plan 2012. The Saugus WRP has an existing treatment capacity of 6.5 million gallons per day (“mgd”). The Valencia WRP has an existing treatment capacity of 21.6 mgd. Both plants are interconnected to form a regional treatment system known as the Santa Clarita Valley Joint Sewerage System (“SCVJSS”) with a total existing design capacity of 28.1 mgd with a current average flow processed of 18.9 mgd. According to the Final 2010 Santa Clarita Valley Urban Water Management Plan (“UWMP”), to accommodate anticipated growth in the Santa Clarita Valley, a 6.0-mgd expansion of the Valencia WRP is planned. With this expansion, the future capacity of the Valencia WRP would be 27.6 mgd. No expansion is planned at the Saugus WRP. The total current planned capacity for both WRPs is 34.1 mgd ~~and current average flow processed is 19.8 mgd~~. ~~During fiscal year 2011-2012, the Saugus WRP produced 4.96 mgd while the Valencia WRP produced 14.86 mgd for a total of 19.82 mgd of recycled water available for reuse with a remaining existing capacity of 8.28 mgd~~. The Project would result in an estimated average daily wastewater generation of approximately 26,520 gallons per day (“gpd”)²². The proposed increase of 26,520 gpd that would result from Project implementation would represent ~~0.32~~ 0.24 percent of the SCVJSS’s total existing remaining capacity of ~~8.28~~ 9.2 mgd. Thus, given the amount of wastewater generated by the Project, existing wastewater treatment capacity, and future wastewater treatment capacity set forth by the Urban Water Management Plan (UWMP), adequate wastewater capacity would be available to serve the Project.

6. Page 6-21. Modify text in the last paragraph:

The Castaic Lake Water Agency (“CLWA”) is the wholesale water supplier to the Valencia Water Company, the retail water purveyor that provides water to the Project site. Existing water resources include wholesale (imported) supplies, local groundwater, recycled water, and water from existing groundwater banking programs. Planned supplies include new groundwater production as well as additional banking programs. As concluded in the 2010 UWMP, and confirmed by the 2014 Santa Clarita Valley Water Report,²³ the CLWA and the retail purveyors have adequate supplies to meet CLWA service area demands, which includes the Project, during normal, single-dry, and multiple-dry years throughout the 40-year planning period.

7. Page 6-23. Modify text in the first paragraph by revising “Draft” to “Adopted” General Plan and removing “(Draft 2014)”:

The Project site is located within the service area of the Sunshine Canyon Landfill and Chiquita Canyon Landfill; refer to Figure 13.1, Landfills, of the Adopted General Plan 2035 ~~(Draft 2014)~~. The Sunshine Canyon Landfill has a maximum permitted throughput of 12,100 tons per day (“tpd”) with a remaining capacity of 96,800,000 cubic yards and an estimated closure date of December 31, 2037. The Chiquita Canyon Landfill has a maximum permitted throughput of 6,000 tpd with a remaining capacity of 22,400,000 cubic yards and an estimated closure date of November 24, 2019.

²² *Per the Sanitation Districts of Los Angeles County, Loading Rates Single family homes = 260 gpd X 102 single family homes = 26,520 gpd.*

²³ *2014 Santa Clarita Valley Water Report for Castaic Lake Water Agency, CLWA Santa Clarita Water Division, Los Angeles County Waterworks District 36, Newhall County Water District, and Valencia Water Company, prepared by Luhdorff & Scalmanini Consulting Engineers, dated June 2015, <http://www.ncwd.org/wordpress/wp-content/uploads/2015/07/2014-Santa-Clarita-Valley-Water-Report.pdf>.*

Section 8.0 – References

1. Page 8-6. Include the following text:

Final Unincorporated Los Angeles County Community Climate Action Plan, County of Los Angeles, Department of Regional Planning, adopted August 2015.
http://planning.lacounty.gov/assets/upl/project/ccap_final-august2015.pdf

2. Page 8-8. Include the following text:

Los Angeles County Department of Regional Planning, Final Los Angeles County General Plan 2035, adopted October 6, 2015, <http://planning.lacounty.gov/generalplan/generalplan>.

Section 9.0 – Mitigation Monitoring and Reporting Program

Project Design Feature 1-4 has been revised and reflected in **Section 4.0, *Mitigation Monitoring and Reporting Program***, of this Final EIR. Mitigation Measures 4.3-5 and 4.3-9 have been revised and reflected in **Section 4.0, *Mitigation Monitoring and Reporting Program***, of this Final EIR.

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4. MITIGATION MONITORING AND REPORTING PROGRAM

4. MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP), which is provided in **Table 4-1, *Mitigation Monitoring and Reporting***, has been prepared pursuant to Public Resources Code Section 21081.6, which requires adoption of a MMRP for projects in which the Lead Agency has required changes or adopted mitigation to avoid significant environmental effects. Los Angeles County is the Lead Agency for the proposed Aidlin Hills Project and therefore is responsible for administering and implementing the MMRP. The decision-makers must define specific reporting and/or monitoring requirements to be enforced during Project implementation prior to final approval of the Project. The primary purpose of the MMRP is to ensure that the mitigation measures identified in the Draft and Final EIR (designated by the respective environmental issue within Chapter 4.0 of the Draft EIR) are implemented, thereby minimizing identified environmental effects. The MMRP also includes the proposed Project Design Features (PDFs) listed throughout Chapter 4.0 the Draft EIR. The PDFs are specific design elements proposed by the Applicant that have been incorporated into the Project to prevent the occurrence of or to minimize the significance of potential environmental effects. Because PDFs have been incorporated into the Project, they do not constitute mitigation measures, as defined by Section 15126.4 of the State CEQA Guidelines (Title 14 of the California Code of Regulations). However, PDFs are included in this MMRP to ensure their implementation as a part of the Project. The Project would include PDFs related to: Aesthetics, Air Quality, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, and Hydrology and Water Quality.

The MMRP for the Project will be in place through all phases of the Project, including design (preconstruction), construction, and operation (both prior to and post-occupancy). Los Angeles County Department of Regional Planning (DRP) is responsible for administering the MMRP. The DRP will ensure that monitoring is documented through periodic reports and that deficiencies are promptly corrected. The designated environmental monitor will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to remedy problems.

Each mitigation measure and PDF is categorized by impact area, with an accompanying identification of:

- The action required, including the phase during which the mitigation measure/PDF should be monitored;
- The timing with which the mitigation measure/PDF must comply;
- The responsible party; and
- The monitoring/enforcing agency.

Table 4-1

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<i>Aesthetics</i>							
PDF 1-1 - The Project would preserve approximately 165 acres (71 percent) as undeveloped, natural areas within the southern and western portions of the Project site. The majority of the developed area of the Project would be west of Wickham Canyon, behind the low and moderate hillside areas that define much of the northern boundary of the Project site, minimizing view impacts along Pico Canyon Road and Pico Canyon Trail. The prominent ridgelines and ridgeline between Mentryville and developed area would be left in their natural conditions.	Design/Plan Check	Prior to recordation of a subdivision map	Permittee	County Department of Regional Planning			
PDF 1-2 - Lighting of streets and select landscaped areas would be provided for safety and security. Lighting provided by the Permittee would have light fixtures that are directed downward and shielded to	Design/Plan Check	Prior to issuance of certificate of occupancy	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
prevent spillover into surrounding areas, while providing sufficient illumination for safety purposes.							
PDF 1-3 - The Project entry would include corner monuments that would serve as the anchor to a split rail fencing system that leads into the Project and would incorporate landscaping. The corner monuments would use earth tone colors and archways along the Pico Canyon trail of an adequate size to allow the passage of horses. A low voltage lighting will be designed to illuminate the signage.	Design/Plan	Prior to issuance of certificate of occupancy	Permittee	County Department of Regional Planning			
PDF 1-4 - The Project's landscape design will utilize a plant palette consisting of fire retardant plants, native and appropriate non-native drought tolerant species. The Project's landscaping would be made up of a mixture of low growing ground cover, medium to large shrubs and trees. As shown,	Design/Landscape Plan Check	Prior to issuance of building permit	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
landscaping and visual buffers would be concentrated along the perimeter of the proposed developed areas, including adjacent to main entryway to the Project from Pico Canyon Road, the new emergency access road, and adjacent to the Southern Oaks neighborhood. The concentration of landscaping in these areas would serve as natural visual buffers between the proposed homes and streets and existing residences, roadways, and trails. To reduce the impacts associated with graded areas and construction of the main Project entry road and emergency access road, these areas would be revegetated and landscaped as soon as feasible following grading and roadway development. The Project site would also incorporate landscaping between the internal residential streetscape system. All landscape plants in the small area located outside the CLWA service area near the proposed water tanks and service road							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
would consist of locally indigenous species, which would temporarily receive imported water/irrigation from mobile tanks during initial establishment only.							
PDF 1-5 - The Project Applicant will install wildlife permeable bollards or other prohibitive structures to inhibit mountain bikes or off-road vehicles from gaining access to open space areas.	Design/Plan	Prior to issuance of certificate of occupancy	Permittee	County Department of Regional Planning			
Air Quality							
Mitigation Measure 4.2-1 - Prior to the issuance of grading permits, the Permittee shall submit evidence to the County Department of Regional Planning that off-road diesel-powered heavy-duty construction equipment greater than 50 horsepower used during grading activities of Project construction meet or exceed the CARB and USEPA Tier 3 off-road emissions standards for heavy-duty equipment.	Pre-Construction and Construction (as necessary)	Prior to issuance of grading permit and periodic site inspections (as necessary)	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>Mitigation Measure 4.2-2 - Prior to the issuance of grading permits, the Permittee shall submit evidence to the County Department of Regional Planning that all heavy-duty diesel-powered equipment in use and/or refueled at the Project site shall use the most current grade of ultra-low sulfur diesel (ULSD) fuel approved by CARB and available in the South Coast Air Basin.</p>	<p>Pre-Construction and Construction (as necessary)</p>	<p>Prior to issuance of grading permit and periodic site inspections (as necessary)</p>	<p>Permittee</p>	<p>County Department of Regional Planning</p>			
<p>Mitigation Measure 4.2-3 - Prior to the issuance of grading permits, the Permittee shall submit evidence, such as contractor agreements, training, or instructional materials, to the County Department of Regional Planning that truck and equipment idling and queuing time shall be limited to five minutes or less, when equipment is not in active use, in accordance with the CARB Airborne Toxic Control Measure.</p>	<p>Pre-Construction and Construction (as necessary)</p>	<p>Prior to issuance of grading permit and periodic site inspections (as necessary)</p>	<p>Permittee</p>	<p>County Department of Regional Planning</p>			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>Mitigation Measure 4.2-4 - The Permittee shall utilize construction equipment having the lowest appropriate horsepower rating for the intended job. The Project Contractor shall be responsible for field inspection sign-off and submittal of compliance certification reports to the County Department of Regional Planning at a frequency determined by the County.</p>	<p>Submittal of contractor agreement and subsequent construction log (as necessary) documenting appropriate equipment horsepower rating</p>	<p>Prior to issuance of grading permit and periodic site inspections (as necessary)</p>	<p>Permittee</p>	<p>County Department of Regional Planning</p>			
<p>Mitigation Measure 4.2-5 - The Permittee shall utilize construction equipment operating on-site that is properly maintained (including engine tuning) at all times in accordance with manufacturers' specifications and schedules. The Project Contractor shall be responsible for field inspection sign-off and submittal of maintenance documentation to the County Department of Regional Planning at a frequency determined by the County.</p>	<p>Submittal of contractor agreement and subsequent construction log (as necessary) documenting proper maintenance of equipment</p>	<p>Prior to issuance of grading permit and periodic site inspections (as necessary)</p>	<p>Permittee</p>	<p>County Department of Regional Planning</p>			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
Mitigation Measure 4.2-6 - The Permittee shall prohibit tampering with construction equipment to increase horsepower or to defeat emission control devices. This prohibition shall be specified in contractor agreements and subject to routine maintenance checks or inspections. The Project Contractor shall be responsible for field inspection sign-off and submittal of compliance certification reports to the County Department of Regional Planning at a frequency determined by the County.	Submittal of contractor agreement and subsequent construction log (as necessary) documenting appropriate equipment maintenance requirements	Prior to issuance of grading permit and periodic site inspections (as necessary)	Permittee	County Department of Regional Planning			
Mitigation Measure 4.2-7 - The use of all construction equipment shall be suspended during a second-stage smog alert in the immediate vicinity of the Project site (e.g., smog alert affecting the Santa Clarita Valley).	Pre-Construction and Construction (as necessary)	Prior to issuance of grading permit and periodic site inspections (as necessary)	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>PDF 2-1 - Apply energy-saving technologies and components to reduce the Project’s electrical use-profile including but not limited to the following:</p> <ul style="list-style-type: none"> ▪ Optimizing the solar orientation of buildings to maximize passive and active solar design techniques; ▪ Installation of energy-efficient/low-energy light fixtures, energy efficient heating and cooling equipment, and energy-efficient appliances (e.g., ENERGY STAR-rated or equivalent). 	Design/Plan Check	Prior to issuance of certificate of occupancy	Permittee	County Department of Regional Planning			
<p>PDF 2-2 - Reduce the energy associated with heating and cooling loads through the use of such techniques as high-albedo (or reflective) roofing such as light-colored, “white” roofs. These roofing technologies increase the reflectance of the</p>	Design/Plan Check	Prior to issuance of certificate of occupancy	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
roofs, and thus reduce emissions from heating and cooling equipment. In addition, these roofs mitigate the heat island effect by reducing the absorption of solar energy.							
PDF 2-3 - Residential units shall be constructed with solar-ready rooftops that provide for the future installation of on-site solar photovoltaic (PV) or solar water heating (SWH) systems. The building design documents shall show an allocated Solar Zone and the pathway for interconnecting the PV or SWH system with the building electrical or plumbing system. The Solar Zone is a section of the roof that has been specifically designated and reserved for the future installation of a solar PV system, solar water heating system, and/or other solar generating system. The Solar Zone must be kept free from roof penetrations and have minimal shading.	Design/Plan Check	Prior to issuance of building permit	Permittee	County Department of Public Works			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
PDF 2-4 - Use commissioning to ensure that the Project’s lighting, mechanical, heating, cooling, ventilation, and other energy and water-consuming systems are operating at their designed levels of efficiency (commissioning is a process to verify that the Project’s energy-related systems are installed, calibrated, and perform according to Project requirements).	Design/Plan Check	Prior to issuance of certificate of occupancy	Permittee	County Department of Regional Planning			
PDF 2-5 - Residential landscaping shall comply with the County’s Tree Planting ordinance (Section 22.52.2130(C)(5)), which requires that each lot containing a single-family residence contain a minimum of two 15-gallon trees, at least one of which shall be from the drought-tolerant plant list.	Design/Plan Check	Prior to issuance of certificate of occupancy	Permittee	County Department of Regional Planning			
PDF 2-6 - Utilize trees and other landscaping where appropriate to provide appropriate shading of the Project’s structures and walkways, thereby reducing	Design/Plan Check	Prior to issuance of certificate of occupancy	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
cooling energy demands and mitigating the heat island effect. Trees and other landscaping also act as a means to capture (sequester) CO ₂ from the atmosphere.							
PDF 2-7 - Reduce water usage and demand by installing water efficient fixtures, such as faucets, showerheads, and toilets meeting or exceeding the USEPA WaterSense® or equivalent standards. On-site reductions in water use would reduce the amount of energy necessary to transport the water to the site, and thus reduce the Project’s water-related energy demand and associated emissions.	Design/Plan Check	Prior to issuance of certificate of occupancy	Permittee	County Department of Regional Planning			
PDF 2-8 - Comply with applicable provisions of the CALGreen code to increase water efficiency through the use of drought-tolerant landscaping and drought-tolerant, native, and fire-retardant trees where feasible. Comply with applicable provisions of the CALGreen code	Design/Plan Check	Prior to issuance of certificate of occupancy	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
for the installation of low-water consumption irrigation systems							
PDF 2-9 - Incorporate recyclable and biodegradable materials where appropriate and economically feasible. Materials may include, but are not limited to, gypsum board, insulation, steel, ceramic tile, countertops, trim, and carpet/carpet padding.	Design/Plan Check	Prior to issuance of building permit	Permittee	County Department of Regional Planning			
Biological Resources							
<p>Mitigation Measure 4.3-1 The loss of slender and Plummer’s mariposa lily individuals from developed areas of the Project site shall be mitigated by the salvage and transplantation of bulbs to appropriate habitat areas in undeveloped portions of the Project site, prior to the issuance of a grading permit.</p> <p>A pre-construction survey during the peak flowering period for the slender mariposa lily and Plummer’s mariposa lily (March to June) shall be conducted by a</p>	Pre-Construction	Prior to issuance of grading permit	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>qualified biologist in the spring prior to construction. The location of each plant observed within the impact area shall be clearly delineated with brightly colored flagging as well as GPS coordinates recorded. Plants within the proposed development footprint and likely to be impacted shall be mitigated by bulb collection (during summer) and subsequent out-planting and propagation. A portion of the bulbs (no greater than 50%) shall then be placed into a suitable mitigation site in the undeveloped portion of the Project site or at an approved off-site location. A qualified biologist shall be selected by the Project Applicant to prepare and implement the mitigation plan. The detailed mariposa lily mitigation and monitoring plan shall include, at a minimum, the following requirements, and be approved by the County of Los Angeles prior to issuance of a grading permit:</p>							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>1. The seeds shall be collected from existing plants and cultivated in nursery until they are ready for transplant into mitigation area at the appropriate time of year or stored for direct seeding in the approved mitigation areas.</p> <p>2. The salvaged bulbs can be immediately transplanted at appropriate time of year to appropriate receptor sites within the Project Area that support suitable habitat matching the habitat characteristics from which the bulbs were collected.</p> <p>3. Mitigation areas used for bulb transplanting and seed sowing shall be as dedicated open space, with the location of the mitigation areas to be selected based upon the habitat quality and suitability. The qualified biologist will undertake pre-ground disturbance flowering season surveys to determine these suitable mitigation areas of comparable</p>							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>soils, slope exposure and vegetation cover.</p> <p>4. Mitigation shall be at a minimum of a 2:1 mitigation-to-impact ratio per individual plant, i.e., two replacement plants provided for every plant that is taken.</p> <p>5. Monitoring of the mitigation areas shall be conducted for five years or until performance standards are achieved—whichever is longer. Monitoring shall be conducted quarterly through the first year and annually thereafter for a total period of at least five years. Monitoring shall address issues of plant establishment and vigor, herbivory, and competition by non-native weedy plants.</p> <p>6. Performance standards shall be described to measure mitigation success by the end of the five-year monitoring program, and contingency measures shall be incorporated to be pursued in the event that</p>							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
performance standards prove to be untenable.							
Mitigation Measure 4.3-2 - The Project design shall dedicate 165 acres as natural open space to provide habitat for western spadefoot, silvery legless lizard, coastal whiptail, coast horned lizard, rosy boa, golden eagle, Cooper’s hawk (foraging), Swainson's hawk (foraging), white-tailed kite (foraging), prairie falcon, turkey vulture, lesser nighthawk, greater roadrunner, hairy woodpecker, mountain bluebird (foraging), loggerhead shrike (foraging), California horned lark, coastal California gnatcatcher, western meadowlark, southern California rufous-crowned sparrow, grasshopper sparrow, Bell’s sage sparrow, spotted bat, pallid bat, Townsend’s bat, western mastiff bat, hoary bat, San Diego black-tailed jackrabbit, southern grasshopper mouse and San Diego desert woodrat.	Design/Plan Check	Prior to issuance of grading permit	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>Mitigation Measure 4.3-3 - Prior to the issuance of a grading permit for ground disturbance, construction, or site preparation activities, the applicant shall retain the services of a qualified biologist to conduct pre construction surveys for western spadefoot within all portions of the Project site containing suitable breeding habitat. Surveys shall be conducted during a time of year when the species is most likely to be detected (e.g., during a normal or greater rain year while rain pools are present and temperatures are suitable for spadefoot activity). If western spadefoot is identified on the Project site, western spadefoot habitat shall be created within suitable natural sites on the Project site outside the proposed development envelope under the direct supervision of the qualified biologist. The amount of occupied breeding habitat to be impacted by the Project shall be replaced at a 2:1 ratio. The</p>	Pre-Construction	Prior to issuance of grading permit	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>actual relocation site design and location shall be approved by CDFW. The location shall be in suitable habitat, including suitable uplands, as far away as is feasible from any of the homes and roads to be built. The relocation ponds shall be designed such that they only support standing water for several weeks following seasonal rains. The biologist shall conduct pre-construction surveys in all appropriate vegetation communities within the development envelope. All western spadefoot adults, tadpoles, and egg masses encountered shall be collected and released in the identified/created relocation ponds described above.</p> <p>A western spadefoot management plan shall be required if western spadefoot is identified on the Project site and would include at a minimum, that any on-site relocation pond be protected in perpetuity with a</p>							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
conservation easement, that relocation ponds shall be designed such that they only support standing water for several weeks following seasonal rains in order that aquatic predators (e.g., fish, bullfrogs, and crayfish) cannot become established, that the pond be located within the proposed Project open space or similar conserved land if off-site, that upland habitat surrounding the proposed relocation site shall be as similar in type, aspect, and density to the location of the existing ponds as is feasible, and that relocation pond success be verified by annual monitoring of the relocation site for five years to gather evidence of spadefoot reproduction at the relocation site. The performance criteria for success of the relocation ponds would include that western spadefoot are reproducing at the relocation site after five years of monitoring and the ponds continue to provide suitable habitat with sufficient seasonal							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
pooling for species reproductive success. Results of the surveys and relocation efforts shall be provided to the County. Collection and relocation of animals shall only occur with the proper scientific collection and handling permits. The results of the monitoring will provided in an annual report to both CDFW and the County.							
Mitigation Measure 4.3-4 - Prior to ground disturbance or grading activities, the applicant shall develop a relocation plan for rosy boa, coast horned lizard, silvery legless lizard, and coastal whiptail. The Plan shall include the timing and location of the surveys (based upon accepted protocols) that would be conducted for each species; identify the locations where more intensive efforts should be conducted; identify the more appropriate habitats within the dedicated open space that are most appropriate for each species; the methods that would	Pre-Construction	Prior to issuance of grading permit	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>be utilized for trapping and relocating the individual species; and provide for the documentation/recording of the species and number of the animals relocated. The Plan shall be submitted to the County for its review and approval 60 days prior to any scheduled ground disturbing activities within potentially occupied habitat.</p> <p>Thirty days prior to construction activities, qualified biologists shall conduct surveys to capture and relocate individual rosy boa, coast horned lizard, silvery legless lizard, and coastal whiptail per the County-approved relocation plan in order to avoid or minimize take of these special status species. The plan shall require a minimum of three (3) surveys conducted during the time of year/day when each species is most likely to be observed. Individuals shall be relocated to nearby undisturbed areas with suitable habitat. If construction</p>							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>is scheduled to occur during the low activity period (generally December through February), the surveys shall be conducted prior to this period and exclusion fencing shall be placed to limit the potential for re-colonization of the site prior to construction. The qualified biologist will be present during ground-disturbing activities immediately adjacent to or within habitat that supports populations of these species. During the construction period, clearance surveys for special-status reptiles shall be conducted by a qualified biologist prior to the initiation of construction each day.</p> <p>Results of the surveys and relocation efforts shall be provided to the County. Collection and relocation of animals shall only occur with the proper scientific collection and handling permits.</p>							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>Mitigation Measure 4.3-5 - Thirty days prior to construction activities, a qualified biologist shall conduct a survey within the proposed construction disturbance zone and within 200 feet of the disturbance zone for San Diego black-tailed jackrabbit and American badger. If San Diego black-tailed jackrabbits are present, non-breeding rabbits shall be flushed from areas to be disturbed. Dens, depressions, nests, or burrows occupied by pups shall be flagged and ground-disturbing activities avoided within a minimum of 200 feet during the offspring-rearing season (February 15 through July 1).</p> <p>If American badgers are present, occupied habitat shall be flagged and ground-disturbing activities avoided within 50 feet of the occupied den. Maternity dens shall be avoided during the rearing season (February 15 through July 1) and a minimum</p>	Pre-Construction	Prior to commencement of vegetation removal or prior to the issuance of grading permit, which ever comes first, as directed by the County	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>200 foot buffer established. This buffer may be reduced based on the location of the den upon consultation with CDFW. Maternity dens shall be flagged for avoidance, identified on construction maps, and a qualified biologist shall be present during construction. If avoidance of a non-rearing den is not feasible, badgers shall be relocated either by trapping or by slowly excavating the burrow (either by hand or mechanized equipment under the direct supervision of the biologist, before or after the rearing season (February 15 through July 1). Any relocation of badgers shall occur only after consultation with CDFW.</p> <p>Results of the surveys and relocation efforts shall be provided to the County and CDFW. Collection and relocation of animals shall only occur with the proper scientific collection and handling permits.</p>							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>Mitigation Measure 4.3-6 - Thirty days prior to construction activities, a qualified biologist shall conduct a survey within the proposed construction disturbance zone and within 200 feet of the disturbance zone for San Diego desert woodrat. If active San Diego desert woodrat nests (stick houses) are identified within the disturbance zone, a construction fence shall be erected around the nest site adequate to provide the woodrat sufficient foraging habitat at the discretion of the qualified biologist. Clearing and construction within the fenced area shall be postponed or halted until young have left the nest. The biologist shall be present during those periods when disturbance activities will occur near active nest areas to avoid inadvertent impacts to these nests.</p> <p>Results of the surveys and relocation efforts shall be provided to the County.</p>	Pre-Construction	Prior to commencement of vegetation removal or prior to the issuance of grading permit, which ever comes first, as directed by the County	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
Collection and relocation of animals shall only occur with the proper scientific collection and handling permits.							
Mitigation Measure 4.3-7 - Where nest avoidance is not possible, the project biologist shall clear vegetation from immediately surrounding active nests followed by a night without further disturbance to allow woodrats to vacate the nest. Preference will be given to non breeding-season destruction of the nests (May through October) and relocation of adults shall target undeveloped areas of the project, including salvage of nest-building material—rocks, sticks, etc. Each occupied nest shall subsequently be gently disturbed by a qualified wildlife biologist in possession of a scientific collecting permit to entice any remaining woodrats to leave the nest and seek refuge outside the Project construction area. The stick nests shall be carefully removed from the	Pre-Construction	Prior to commencement of vegetation removal or prior to the issuance of grading permit, which ever comes first, as directed by the County	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
Project construction area and be placed near a suitable vegetation or rocky substrate similar to original nest location. The project biologist shall document all woodrat nests moved and provide a written report to the County.							
Mitigation Measure 4.3-8 The project applicant shall be responsible to avoid the direct loss of non-game animals, including bats, during construction activities. Activities that could result in disturbance impacting bat maternity or hibernation roosts shall be scheduled to avoid sensitive periods (April 1 to September 15 for maternity roosts and December 1 to March 31 for hibernation roosts). Where potential roost sites must be removed, a qualified biologist shall conduct a pre-construction survey to identify those structures and habitats proposed for disturbance that could provide bat hibernacula, nursery	Pre-Construction and Construction (as necessary)	Prior to commencement of vegetation removal or prior to the issuance of grading permit, which ever comes first, as directed by the County, and periodic site inspections (as necessary)	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>colony roosting habitat for bats or subterranean burrows for wildlife. Each structure or suitable habitat area identified as potentially supporting an active bat roost or burrow shall be closely inspected by the biologist no greater than seven (7) days prior to disturbance to more precisely determine the presence or absence of roosting bats or non-game wildlife.</p> <p>To avoid the potential direct loss of special-status bat species from disturbance to rocky cliff crevices that may provide maternity roost habitat, the following steps shall be taken:</p> <p>1. To the extent feasible, disturbance to suitable bat roosting habitat shall be scheduled from September 16 – November 30, outside of the maternity roosting and hibernation seasons. The most suitable bat roosting habitats on the Project site are the rocky outcrops at the southern</p>							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>boundary (approximately 800 feet distant from the proposed construction area) and within oak and walnut trees. A bat specialist shall conduct a pre-construction survey of the development footprint and surrounding 200 feet for possible bat roosting habitat within these areas. If the bat specialist determines that no roosting bats are present within the survey area, no further action shall be necessary in regard to roosting bat species (both special-status and non-special-status, non-game species).</p> <p>2. If maternity or hibernation roosts are found, a 200-foot buffer around maternity roosts within or adjacent to the development footprint shall be left in place until the end of the maternity or hibernation season, whereupon a qualified bat specialist must determine that the bats are no longer hibernating or that young have become volant before the</p>							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>buffer may be removed.</p> <p>3. If bat roosts are impacted during construction, the project applicant will provide replacement roosts within similar habitat and with a gap no greater than 3.8 centimeters and interior surface comparable to that of the original roost. The replacement roost should be swabbed with bat guano and urine collected from the original roost.</p> <p>4. The bat specialist shall document all survey results and prepare a summary report to the County. If Townsend’s big-eared bat is detected during pre-construction surveys, all construction-related activity shall be halted immediately and CDFW shall be notified. Work may only resume subsequent to CDFW approval.</p>							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>Mitigation Measure 4.3-9 Impacts to sensitive plant communities (i.e., Thick-leaved Yerba Santa Scrub, Giant Wild Rye Grassland, California Bush Sunflower Scrub, Toyon Chaparral, and Foothill Ash Scrub) shall be mitigated using one or more of the following:</p> <ol style="list-style-type: none"> 1. On-site restoration or enhancement of sensitive plant communities (e.g., transplantation, seeding, or planting of representative plant community species; salvage/dispersal of duff and seed bank) at a ratio no less than 1:1 for temporary impacts and 2:1 for permanent impacts, subject to the approval of the County of Los Angeles. 2. Purchase of mitigation credits at an agency-approved off-site mitigation bank within Los Angeles County or in-lieu fee program at a ratio no less than 1:1, subject to the approval of the County of Los Angeles. 	Pre-Construction and Construction (as necessary)	Prior to issuance of grading permit	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>If mitigation is to occur on-site or off-site, habitat mitigation and monitoring plan shall be prepared and approved by the County Biologist prior to the issuance of a grading permit. The plan shall focus on the creation of equivalent habitats within disturbed habitat areas of the project site or off-site. In addition, the plan shall provide details as to the implementation of the plan, maintenance, and future monitoring including the following components:</p> <ol style="list-style-type: none"> 1. Description of existing sensitive habitats on the Project site; 2. Summary of permanent impacts to sensitive communities based on approved Project design; 3. Proposed location for mitigation areas, either on-site or off-site, with description of existing conditions prior to mitigation implementation; 							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>4. Detailed description of restoration or enhancement goals;</p> <p>5. Description of implementation schedule, site preparation, erosion control measures, planting plans, and plant materials;</p> <p>6. Provisions for mitigation site maintenance and control on non-native invasive plants;</p> <p>7. Provision to monitor development perimeter for presence of Argentine ant and control if present; and</p> <p>8. Monitoring plan, including performance standards, adaptive management measures, and monitoring reporting to the County of Los Angeles.</p>							
<p>Mitigation Measure 4.3-10 - Prior to the issuance of any grading permit for permanent impacts in the areas designated as jurisdictional features, the</p>	Pre-Construction	Prior to issuance of grading permit	Permittee	County Department of Regional Planning, U.S. Army Corps of Engineers, Regional water Quality Control			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>Project applicant shall obtain a CWA Section 404 permit from the USACE, a CWA Section 401 permit from the RWQCB, and Streambed Alteration Agreement permit under Section 1602 of the California Fish and Game Code from the CDFW, where the project warrants. The following would be incorporated into the permitting, subject to approval by the regulatory agencies:</p> <p>1. On- or off-site restoration or enhancement of USACE/RWQCB jurisdictional “waters of the U.S.”/“waters of the State” and wetlands at a ratio no less than 2:1 for permanent impacts, and for temporary impacts, restore impact area to pre-project conditions (i.e., revegetate with native species, where appropriate). Off-site restoration or enhancement at a ratio no less than 2:1 may include the purchase of mitigation credits at an agency-approved off-site mitigation bank or in-lieu fee program</p>				Board, and California Department of Fish and Wildlife			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>within Los Angeles County or within the same watershed acceptable to the County, where the location has comparable ecological parameters such as habitat types, species mix and elevational range.</p> <p>2. On- or off-site restoration or enhancement of CDFW jurisdictional streambed and associated riparian habitat at a ratio no less than 2:1 for permanent impacts, and for temporary impacts, restore impact area to pre-project conditions (i.e., revegetate with native species, where appropriate). Off-site restoration or enhancement at a ratio no less than 2:1 may include the purchase of mitigation credits at an agency-approved off-site mitigation bank or in-lieu fee program within Los Angeles County or within the same watershed acceptable to the County, where the location has comparable ecological parameters such as</p>							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
habitat types, species mix and elevational range.							
<p>Mitigation Measure 4.3-11 - Prior to the issuance of any grading permit that would require removal of potential habitat for raptor and songbird nests, the Project applicant shall contract for the services of a biological monitor acceptable to the County to be present before and during initial grubbing and grading operations to salvage and place onto adjacent habitat any wildlife species that may likely be killed or injured by heavy equipment activities. The Project applicant shall demonstrate to the satisfaction of the County of Los Angeles that either of the following have been or will be accomplished:</p> <p>1. Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding</p>	Pre-Construction and Construction (as necessary)	Prior to issuance of grading permit	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>season which generally runs from February 1-August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.</p> <p>2. If avoidance of the avian breeding season is not feasible, a qualified biologist with experience in conducting breeding bird surveys shall conduct weekly bird surveys beginning thirty days prior to the initiation of project activities, to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas</p>							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
allows) any other such habitat within 500 feet of the disturbance area. The surveys should continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of project activities. If a protected native bird is found, the project proponent should delay all project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, must be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, or construction fencing should be used to demarcate the inside boundary							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>of the buffer of 300 feet (or 500 feet) between the project activities and the nest. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. The project proponent should provide the Department of Regional Planning the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds.</p> <p>If the biological monitor determines that a narrower buffer between the project activities and observed active nests is warranted, he/she should submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and</p>							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>foraging areas) to the Department of Regional Planning and, upon request, the CDFW. Based on the submitted information, the Department of Regional Planning (and the CDFW, if the CDFW requests) will determine whether to allow a narrower buffer.</p> <p>The biological monitor shall be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor shall send weekly monitoring reports to the Department of Regional Planning during the grubbing and clearing of vegetation, and shall notify the Department of Regional Planning immediately if project activities damage active avian nests.</p>							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>Mitigation Measure 4.3-12 - The Permittee shall mitigate through a two to one mitigation to impact ratio for the removal of one coast live oak trees. Each replacement tree shall be at least a 15-gallon size specimen and measure at least one inch in diameter one foot above the base. The Permittee shall coordinate with the County Forester and Department of Regional Planning prior to removing of the oak tree on the acceptable location for the replacement planting location. The Permittee shall comply with the conditions of the approved Oak Tree Permit 00-136.</p>	Pre-Construction	Prior to issuance of grading permit	Permittee	County Department of Regional Planning			
Cultural Resources							
<p>Mitigation Measure 4.4-1 - The Permittee shall retain a qualified archaeological monitor who shall be present during construction excavations (e.g., grading, trenching, or clearing/grubbing) in areas where the Larinan Apiary structures once existed in</p>	Pre-Construction and Construction (as necessary)	Prior to issuance of grading permit and periodic site inspections (as necessary)	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
the northern portion of the Project site. Other areas outside the boundaries of the Larinan Apiary structures shall not be monitored. The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus artificial fill soils), and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections if determined adequate by the archaeological monitor.							
Mitigation Measure 4.4-2 - In the event that archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. A buffer area of at least 25 feet shall be established around the find where construction activities	Construction (as necessary)	Upon discover of potential archaeological resources (as necessary)	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by a qualified archaeologist. The Permittee shall coordinate with the archaeologist to develop an appropriate treatment plan for the resources. Treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis or preservation in place. The Permittee, in consultation with the archaeologist, shall designate repositories in the event that archaeological material is recovered.							
Mitigation Measure 4.4-3 - The archaeological monitor shall prepare a final report at the conclusion of archaeological monitoring. The report shall be submitted by the Permittee to	Construction (as necessary)	Upon discover of potential archaeological resources (as necessary)	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
the County, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures. The report shall include a description of resources unearthed, if any, treatment of the resources, and evaluation of the resources with respect to the California Register of Historical Resources.							
Mitigation Measure 4.4-4 - The Permittee shall retain a Native American tribal monitor from the Fernandeño Tataviam group who shall be present during construction excavations (e.g., grading, trenching, or clearing/grubbing) associated with the proposed Project. The frequency of monitoring shall be determined by the tribal monitor, who shall take into account the rate of excavation and grading activities, proximity to known archaeological	Construction (as necessary)	Prior to issuance of grading permit and upon discover of potential archaeological resources (as necessary) and periodic site inspections (as necessary)	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
resources, the materials being excavated (native versus artificial fill soils), and the depth of excavation, and if found, the abundance and type of prehistoric archaeological resources encountered. Full-time tribal monitoring may be reduced to part-time inspections if determined adequate by the Native American monitor. If prehistoric archaeological resources are encountered during construction, the Native American monitor shall advise the Permittee and archaeologist regarding the treatment and curation of the resources as described in Mitigation Measure 4.4-2. As discussed Mitigation Measure 4.4-2, the archaeological monitor shall have the authority to halt or divert ground-disturbing activities away from the vicinity of the find so that it can be evaluated and a subsequent treatment plan be prepared and implemented. The tribal monitor shall advise the archaeological							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
monitor regarding decisions to halt or divert work from the vicinity of a find.							
Mitigation Measure 4.4-5 - If human remains are unearthed during implementation of the Project, the Permittee shall comply with State Health and Safety Code Section 7050.5. The Permittee shall immediately notify the County Coroner and no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the landowner, inspect the site of the discovery of the Native American remains and may recommend to the	Construction (as necessary)	Upon discover of human remains (as necessary)	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
landowner means for treating or disposing, with appropriate dignity, the human remains and any associated funerary objects. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the landowner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and cultural items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, taking into account the possibility of							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment. If reburial is recommended, the MLD shall file a record of the reburial with the NAHC and the Project archaeologist shall file a record of the reburial with the CHRIS-SCIC.</p> <p>If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the facility property in a location not subject to further</p>							

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
and future subsurface disturbance. A record of the reburial shall be filed with the NAHC and the CHRIS-SCCIC.							
Mitigation Measure 4.4-6 - A qualified Paleontologist shall be retained to develop and implement a paleontological monitoring program for construction excavations that would encounter older Quaternary alluvium or deposits associated with Pico Formation or Towsley Formation. The Paleontologist shall attend a pre-grading/excavation meeting to discuss a paleontological monitoring program. A qualified paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations into older Quaternary alluvium,	Pre-Construction and Construction (as necessary)	Prior to issuance of grading permit and periodic site inspections (as necessary)	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
or deposits associated with Pico Formation or Towsley Formation. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered.							
Mitigation Measure 4.4-7 - If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage. A buffer area of at least 25 feet shall be established	Construction (as necessary)	Upon discovery of fossils (as necessary)	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Paleontologist’s discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository. Any fossils collected shall be donated to a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County. Accompanying notes, maps, and photographs shall also be filed at the repository.							
Mitigation Measure 4.4-8 - The paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in	Construction (as necessary)	Prior to issuance of building permit	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Permittee to the lead agency and the Natural History Museum of Los Angeles County, and other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.							
<i>Geology and Soils</i>							
PDF 5-1 - The upper alluvial soils susceptible to liquefaction within Wickham Canyon shall be removed.	Submittal of Grading Plan	Prior to issuance of grading permit	Permittee	County Department of Public Works			
PDF 5-2 - During grading, remove the existing landslide within the grading footprint.	Submittal of Grading Plans	Prior to issuance of final grading clearance	Permittee	County Department of Public Works			
PDF 5-3 - Alluvial soils susceptible to hydroconsolidation shall be removed to competent natural material during grading. All alluvial deposits within the	Submittal of Grading Plans	Prior to issuance of final grading clearance	Permittee	County Department of Public Works			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
grading footprint shall be removed.							
Greenhouse Gas Emissions							
<p>PDF 6-1 - Apply energy-saving technologies and components to reduce the Project’s electrical use-profile including, but not limited to, the following:</p> <ul style="list-style-type: none"> ▪ Optimizing the solar orientation of buildings to maximize passive and active solar design techniques; ▪ Installation of energy-efficient/low-energy light fixtures, energy efficient heating and cooling equipment, and energy-efficient appliances (e.g., ENERGY STAR-rated or equivalent). 	Design/Plan Check	Prior to issuance of certificates of occupancy	Permittee	County Department of Regional Planning			
<p>PDF 6-2 - Reduce the energy associated with heating and cooling loads through the use of</p>	Design/Plan Check	Prior to issuance of certificates of	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
such techniques as high-albedo (or reflective) roofing such as light-colored, “white” roofs. These roofing technologies increase the reflectance of the roofs, and thus reduce emissions from heating and cooling equipment. In addition, these roofs mitigate the heat island effect by reducing the absorption of solar energy.		occupancy					
PDF 6-3 - Residential units shall be constructed with solar-ready rooftops that provide for the future installation of on-site solar photovoltaic (PV) or solar water heating (SWH) systems. The building design documents shall show an allocated Solar Zone and the pathway for interconnecting the PV or SWH system with the building electrical or plumbing system. The Solar Zone is a section of the roof that has been specifically designated and reserved for the future installation of a solar PV system, solar water heating system, and/or other solar	Design/Plan Check	Prior to issuance of certificates of occupancy	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
generating system. The Solar Zone must be kept free from roof penetrations and have minimal shading.							
PDF 6-4 - Use commissioning to ensure that the Project's lighting, mechanical, heating, cooling, ventilation, and other energy and water-consuming systems are operating at their designed levels of efficiency (commissioning is a process to verify that the Project's energy-related systems are installed, calibrated, and perform according to Project requirements).	Design/Plan Check	Prior to issuance of certificates of occupancy	Permittee	County Department of Regional Planning			
PDF 6-5 - Residential landscaping shall comply with the County's Tree Planting ordinance (Section 22.52.2130(C)(5)), which requires that each lot containing a single-family residence contain a minimum of two 15-gallon trees, at least one of which shall be from the drought-tolerant plant list.	Design/Plan Check	Prior to issuance of certificates of occupancy	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
PDF 6-6 - Utilize trees and other landscaping where appropriate to provide appropriate shading of the Project's structures and walkways, thereby reducing cooling energy demands and mitigating the heat island effect. Trees and other landscaping also act as a means to capture (sequester) CO ₂ from the atmosphere.	Design/Plan Check	Prior to issuance of certificates of occupancy	Permittee	County Department of Regional Planning			
PDF 6-7 - Reduce water usage and demand by installing water efficient fixtures such as faucets, showerheads, and toilets meeting or exceeding the USEPA WaterSense® or equivalent standards. On-site reductions in water use would reduce the amount of energy necessary to transport the water to the site, and thus reduce the Project's water-related energy demand and associated emissions.	Design/Plan Check	Prior to issuance of certificates of occupancy	Permittee	County Department of Regional Planning			
PDF 6-8 - Comply with applicable provisions of the CALGreen code to increase water efficiency through the use of	Design/Plan Check	Prior to issuance of certificates of occupancy	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
drought-tolerant landscaping and drought-tolerant, native, and fire-resistant trees to support water conservation efforts where feasible. Comply with applicable provisions of the CALGreen code for the installation of low-water consumption irrigation systems.							
PDF 6-9 - Incorporate recyclable and biodegradable materials where appropriate and economically feasible. Materials may include, but are not limited to, gypsum board, insulation, steel, ceramic tile, countertops, trim, and carpet/carpet padding.	Design/Plan Check	Prior to issuance of certificates of occupancy	Permittee	County Department of Regional Planning			
Hazards and Hazardous Materials							
Mitigation Measure 4.7-1 - Prior to issuance of a grading permit for the Project, the Permittee shall comply with the proper abandonment standards of the State of California Division of Oil, Gas and Geothermal Resources (DOGGR). A DOGGR monitor shall be present on site	Pre-Construction	Prior to issuance of grading permit	Permittee	County Department of Regional Planning and DOGGR			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
during all abandonment activities on the on-site oil wells.							
Mitigation Measure 4.7-2 - Prior to the issuance of a grading permit for the Project, the Permittee shall submit a community health and safety plan, worker health and safety plan, and the Soils Management Plan (SMP) prepared by a California-licensed professional geologist to the LACFD and/or the DTSC. The SMP would state if the soil shall require special handling either in advance of grading activating or concurrent with grading work and describe various remedial options (including off-site disposal or on-site reuse). The SMP shall include protocols for screening of soil exhibiting impacts; handling and/or disposal of the soils impacted with petroleum hydrocarbon, title 22 metals, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), organochlorine pesticides	Pre-Construction	Prior to issuance of grading permit	Permittee	County Fire Department			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
(OCPs), and polychlorinated biphenyls (PCBs); stockpile management; vapor suppression and dust control; surface water protection; soil stockpile sampling; sampling frequency; and exporting of contaminated soils.							
Mitigation Measure 4.7-3 - Prior to Tentative Map recordation, a Preliminary Water System Design Report or equivalent from the Valencia Water Company describing the water supply system, pump system, and fire flow shall be submitted and approved by the LACFD. The Preliminary Water System Design Report shall list the design features that would ensure the required fire flow during a major wildfire incident. The Permittee shall be responsible for funding any necessary water infrastructure upgrades and/or improvements to meet fire flow requirements.	Design/Plan Check	Prior to Tentative Map recordation	Permittee	County Fire Department			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>PDF 7-1 - The two existing, plugged abandoned wells identified on the site as “dry holes” and labeled Gerald 1, API 03705406 (western well) and Overman 1, API 03705378 (eastern well) would be over 300 feet from any proposed residential pads planned for development by the Project. The locations of the former wells would be clearly shown on construction drawings that are reviewed and approved prior to the issuance of grading permits by the Building and Safety Division.</p>	<p>Submittal of Grading Plans</p>	<p>Prior to issuance of grading permit</p>	<p>Permittee</p>	<p>County Department of Regional Planning</p>			
<p>PDF 7-2 - Prior to the commencement of mass grading activities, a preconstruction meeting with the selected grading contractor would be held to ensure that said contractor is aware of the area of petroleum staining and odors located on-site and west of Wickham Canyon so that it is handled and managed appropriately in accordance with</p>	<p>Submittal of preconstruction meeting summary including when meeting took place and who was in attendance</p>	<p>Prior to the commencement of mass grading activities and during the course of earthwork activities</p>	<p>Permittee</p>	<p>County Fire Department</p>			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
regulatory guidelines including, but not limited to, DOGGR, the Regional Water Quality Control Board, and/or LACFD. Further, during the course of earthwork activities, the selected grading contractor shall notify the site owner and/or their designated representative (i.e. general contractor or other designated party) if additional areas of impacted soils are discovered on-site so that such areas would also be handled and managed appropriately.							
PDF 7-3 - The proposed water tank access road would provide a minimum paved width of 20 feet. The access maybe reduced to a minimum width of 15 feet if accepted by the Valencia Water Company. (This PDF to be verified by LACFD prior to recordation of the Tentative Map.)	Design/Plan Check	Prior to recordation of the Tentative Map	Permittee	County Department of Regional Planning			
PDF 7-4 - For the safety of construction personnel, neighboring homes, and	Design/Plan Check	Prior to issuance of grading	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
firefighting safety in the wildland areas, the Project Applicant, under the supervision of the Fire Chief, would complete the Project roadways in accordance with applicable LACFD and/or County design standards in the area prior to grading permit issuance.		permit					
PDF 7-5 – The Project would include two, 250,000-gallon water storage tanks, one booster station, two pressure regulating stations, and a 12-inch pipeline within Pico Canyon with a secondary point of connection at Verandah Court. The proposed water infrastructure could be utilized for firefighting purposes. (This PDF to be verified by LACFD prior to recordation of the Tentative Map.)	Design/Plan Check	Prior to issuance of grading permit	Permittee	County Fire Department			
	Construction Inspection	Prior to issuance of building permit					
Hydrology and Water Quality							
Mitigation Measure 4.8-1 - Turf Reinforcing Mat (TRM) shall be placed along any grading within the on-site Pico Canyon and	Submittal of Grading Plans	Prior to issuance of grading permit	Permittee	County Department of Public Works			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
Wickham Canyon Creek reaches where the floodplain would run along the slopes adjacent to the drainage courses.							
PDF 8-1 - The Project shall direct storm flows by closed pipe to a bio-infiltration basin or directly to storm drain inlets for high flow events. The bio-filtration basin would be located at the southeast corner of Pico Canyon Road and "A" Street. All water quality flows shall go to the bio- infiltration basin prior to entering the public storm drain system. The water quality basin would be designed with high flow bypasses to insure no damage to adjacent homes or slopes. The proposed condition would outlet all storm flows to the Pico Canyon Road drainage system. The County of Los Angeles would be the entity in charge of maintenance for this structure.	Design/Plan Check (Grading and/or storm drain plan)	Prior to issuance of grading and/or storm drain permit	Permittee	County Department of Public Works			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>PDF 8-2 - <u>Pico Canyon Creek - Double 18'W x 12'H Concrete Box Culvert @ 348 feet long.</u> This culvert would run below the proposed intersection of Pico Canyon Road and "A" Street. This culvert is proposed as a double box (each box at 18 ft wide by 12 ft high) and would be sized with a 2-foot-thick intermediate wall and 1-foot-thick outer side and top walls (as an initial assumption). This culvert would be designed to be self-cleaning for sediment transport purposes during the 50-YR Burned and Bulk (BB) capital event. This culvert would outlet approximately 220 feet upstream of the inlet of the existing 24'W x 14'H box culvert structure of private drain (PD) 2495. Grouted riprap shall be installed at the proposed Pico Canyon Road culvert outlet apron, as well as wingwalls to reduce velocity at the inlet of the existing 24'W x 14'H reinforced concrete box (RCB).</p>	Design/Plan Check	Prior to issuance of road and flood permits	Permittee	County Department of Public Works			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>PDF 8-3 - Wickham Canyon Creek #1- Single 12'W x 12'H Concrete Box @ 210 feet long. This culvert would run below pad slope grading and the proposed "A" Street. This culvert would outlet directly into Pico Canyon Creek approximately 125 feet upstream of the inlet for the larger double box culvert at Pico Canyon Road. The outlet structure of this culvert would be orientated at an efficient angle with the flow path of Pico Canyon Creek to minimize junction losses in this area. This culvert would be designed to be self cleaning for sediment transport purposes during the 50-YR BB capital event. The culvert would operate under Inlet Control and be equipped with a riprap lined outlet.</p>	Design/Plan Check	Prior to issuance of road and flood permits	Permittee	County Department of Public Works			
<p>PDF 8-4 - Wickham Canyon Creek #2- 12'W x 12'H Arch Bridge. This bridge would span over Wickham Canyon Creek along the proposed Verandah Court roadway corridor and</p>	Design/Plan Check	Prior to issuance of road and flood permits	Permittee	County Department of Public Works			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
would be upstream of the Wickham Canyon Creek #1 culvert. Alignment would be approximately perpendicular to that of the road.							
Noise							
<p>Mitigation Measure 4.10-1 - Temporary construction noise barriers shall be implemented as follows:</p> <ul style="list-style-type: none"> The Project shall ensure the provision of a minimum of 15 dBA noise barrier between the Project construction and the existing single-family residential uses (R1) to the northeast of the Project site during grading/excavation phases when heavy construction equipment operate within 1000 feet from the nearest noise sensitive receptor locations. The temporary barrier shall be a 	Pre-Construction and Construction	Period site inspections during construction (as necessary)	Permittee	County Department of Regional Planning, Department of Public Health			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>minimum height of 20 feet and block the line-of-site between construction equipment and noise-sensitive receptors during grading/excavation phases.</p> <ul style="list-style-type: none"> The Project shall ensure the provision of a minimum of 6 dBA noise barrier between the Project construction and the existing single-family residential uses (R2) along Verandah Court during grading/excavation phases. 							
<p>Mitigation Measure 4.10-2 - Construction activities shall be scheduled so as to avoid operating more than two pieces of heavy equipment simultaneously within 100 feet from residential uses, which causes high noise levels during grading/excavation phases.</p>	Construction	Period site inspections during construction (as necessary)	Permittee	County Department of Regional Planning, Department of Public Health			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
Public Services							
Fire Protection Services - Refer to Mitigation Measures 4.7-3.							
Schools - Refer to Mitigation Measures 4.12-1. The following mitigation measures are also prescribed.							
Mitigation Measure 4.11-1 - During construction, on-going communication shall be maintained with school administration at the Pico Canyon Elementary School, providing sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to the school may be impacted in order to ensure school traffic and pedestrian safety. This mitigation measure is to be verified by the Los Angeles County DRP in quarterly compliance certification reports submitted by the Project contractor.	Construction	Periodic communications with schools during construction (as necessary)	Permittee	County Department of Regional Planning			
Mitigation Measure 4.11-2 - In order to ensure school traffic and pedestrian safety, during construction, construction vehicles shall not haul past the Pico Canyon Elementary School	Construction	Period site inspections during construction (as necessary)	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
except when school is not in session. If that is infeasible, construction vehicles shall not haul during school arrival or dismissal times. This mitigation measure is to be verified by the Los Angeles County DRP in quarterly compliance certification reports submitted by the Project contractor.							
Mitigation Measure 4.11-3 - During construction, crossing guards shall be provided by the Permittee in consultation with the Pico Canyon Elementary School, as appropriate, when safety of students may be compromised by construction-related activities at impacted school crossings in order to ensure school pedestrian safety. This mitigation measure is to be verified by the Los Angeles County DRP in quarterly compliance certification reports submitted by the Project contractor.	Construction	Period site inspections during construction (as necessary)	Permittee	County Department of Regional Planning			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
<p>Mitigation Measure 4.11-4 - During all hours of construction, temporary traffic control, signage, and/or flaggers shall be present on Pico Canyon Road to direct vehicular traffic and pedestrians around the construction site in order to ensure school traffic and pedestrian safety. This mitigation measure is to be verified by the Los Angeles County DRP in quarterly compliance certification reports submitted by the Project contractor.</p>	Construction	Period site inspections during construction (as necessary)	Permittee	County Department of Regional Planning			
<p>Traffic/Transportation</p> <p>Refer to Mitigation Measures 4.11-1 to 4.11-4 regarding construction traffic noise. The following mitigation measure is also prescribed.</p>							
<p>Mitigation Measures 4.12-1 - Prior to the issuance of an encroachment permit within the public right-of-way, the Permittee, in coordination with the Los Angeles County DPW, shall devise a Traffic Control Plan to be implemented during construction of the Project. The Traffic Control Plan shall identify</p>	Submittal of Traffic Control Plan	Prior to issuance of encroachment permit	Permittee	County Department of Public Works			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
all traffic control measures, signs, and delineators to be implemented by the construction contractor through the duration of construction activities associated with the Project improvements for Pico Canyon Road. Further, the Traffic Control Plan would include provisions for the construction contractor to transport large-size trucks during off-peak hour commute periods. The Traffic Control Plan shall be subject to final approval by the Los Angeles County DPW.							
Mitigation Measure 4.12-2 – Prior to Final Map clearance, the permittee shall be responsible for the payment of a pro-rata share contribution of four percent to convert the shared through/right-turn lane to one through lane and one right-turn lane on the east approach of the intersection of The Old Road and Stevenson Ranch Parkway. This conversion would result in a total of two left-turn lanes, two	Payment of Pro-Rata Share	Prior to Final Map clearance	Permittee	County Department of Public Works			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Project Design Features (PDF)/Mitigation Measures	Action Required	Timing	Responsible Party	Monitoring/Enforcing Agency	Compliance Verifications		
					Initial	Date	Comments
through lanes, and one right-turn lane on the east approach. Additionally, the permittee shall be responsible for the payment of a pro-rata share contribution of four percent to add an overlap phase for the westbound right turn movement.							

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