

## **SECTION ES**

### **EXECUTIVE SUMMARY**

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This Environmental Impact Report (EIR) analyzes the potential for significant environmental impacts associated with the proposed Single-Family Residential Hauled Water Initiative (proposed initiative). The area that would be subject to the proposed initiative consists of 42,867 parcels in the unincorporated territory of Los Angeles County.<sup>1</sup> The combined proposed initiative study area consists of approximately 340,461 acres or approximately 532 square miles. Although this is a Countywide initiative, the parcels that would potentially be affected by the proposed initiative are located entirely within the 5th Supervisorial District in the northern one-third of the County, including areas located in the San Gabriel Mountains, in the Antelope Valley; areas located northeast of the City of Santa Clarita, north and south of California State Route 14; and areas that are southwest of the City of Palmdale in the communities of Agua Dulce and Acton.

#### **ES.1 PROJECT DESCRIPTION**

The Los Angeles County Board of Supervisors directed the preparation of a proposed ordinance that would allow the use of hauled water as a primary and sustainable source of potable water on lots with an average slope of less than 50 percent where it has been demonstrated that potable water for domestic requirements cannot be provided by an on-site groundwater well, and where the lot meets all of the following criteria at the time of the hauled water permit application and as of the effective date of an ordinance authorizing the use of hauled water: (a) the lot is an existing legal lot or entitled to a certificate of compliance; (b) is vacant and has never been developed; (c) is greater than 2,000 square feet in size; (c) is outside the boundaries of a public or private water district; and (d) has a land use designation and is within a zone allowing for the development of a single-family residence.<sup>2</sup>

#### **ES.2 LOCATION**

The working draft ordinance (Appendix A) is proposed for parcels that are larger than 2,000 square feet in size, with slopes under 50 percent (26.6 degrees). All criteria would need to be met at the effective date of the ordinance. The term vacant is used as identified by the County Assessor. The ordinance would be applicable solely to the unincorporated areas of Los Angeles County.

The subject parcels have been categorized into seven subareas:

1. **Lake Hughes/Gorman/West of Lancaster:** The Lake Hughes/Gorman/West of Lancaster subarea is located in an area generally located west of State Highway 14 and north of the Angeles National Forest. This subarea consists of 15,166 parcels and encompasses approximately 195.4 square miles (125,041.4 acres).

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<sup>1</sup> Assessor's Parcels Numbers for the referenced parcels are on file at the Los Angeles County Department of Regional Planning.

<sup>2</sup> The Working Draft Ordinance is a conceptual draft of an ordinance implementing the Proposed Initiative. The final form of the ordinance will be determined by the Board of Supervisors. The final form of the ordinance is expected to be similar to the Working Draft Ordinance, but may contain additional or revised provisions, conditions, or requirements as informed by the environmental review process or as recommended by County departments in order to insure the orderly implementation of the hauled water permit process and resulting development.

2. **Lancaster Northeast:** The Lancaster Northeast subarea is located in an area generally east of State Highway 14 and north of East Avenue J. This subarea consists of 6,794 parcels and encompasses approximately 55.2 square miles (35,324.90 acres).
3. **Antelope Valley Northeast:** The Antelope Valley Northeast subarea is located in an area generally located north of East Avenue E and east of 165th Street East in the far northeastern portion of Los Angeles County. This subarea consists of 1,938 parcels and encompasses approximately 22.7 square miles (14,528.23 acres).
4. **Lake Los Angeles/Llano/Valyermo/Littlerock:** The Lake Los Angeles/Llano/Valyermo/Littlerock subarea is located in an area generally south of East Avenue J, east of 47th Street East. This subarea consists of 14,822 parcels and encompasses approximately 168.8 square miles (108,067.33 acres).
5. **Acton:** The Acton subarea is located in an area generally east of Hubbard Road and West of 47th Street East. This subarea consists of 1,246 parcels and encompasses approximately 28.2 square miles (18,067.22 acres).
6. **Castaic/Santa Clarita/Agua Dulce:** The Castaic/Santa Clarita/Agua Dulce subarea is located generally west of Hubbard Road and north of the 210 Freeway excluding Kagel Canyon. This subarea consists of 2,243 parcels and encompasses approximately 55.2 square miles (35,340.2 acres).
7. **East San Gabriel Mountains:** The East San Gabriel Mountains subarea consists of parcels generally located within the Angeles National Forest east of State Highway 14, north of the 210 freeway, south of the Pearblossom Highway, and west of the San Bernardino County line. This subarea consists of 658 parcels and encompasses approximately 6.4 square miles (4,092.26 acres)

### ES.3 PUBLIC PARTICIPATION AND SCOPING PROCESS

The preparation of the EIR involved an extensive scoping and public participation process. The Notice of Preparation (NOP) provided notification of four public scoping meetings for interested parties to receive information on the proposed initiative and the CEQA process as well as providing an opportunity for the submittal of comments on the issues to be included in the EIR:

- September 24, 2014, at the Agua Dulce Women’s Club located at 33201 Agua Dulce Canyon Road, in the community of Agua Dulce, California. Attended by 37 individuals.
- October 1, 2014, at the Juniper Hills Community Center located at 31401 N. 106th East, Juniper Hills, California. Attended by 37 individuals.
- October 8, 2014, at the Acton Community Club located at 3748 West Nickels Avenue, Acton, California. Attended by 37 individuals.
- October 15, 2014, at the General William J. Fox Airfield located at 4555 West Avenue G, Lancaster, California. Attended by 25 individuals.

Although the NOP was originally circulated on September 17, 2014, subsequent refinements to the proposed initiative study area identified additional parcels that could potentially qualify to use hauled water under the proposed initiative. This resulted in recirculation of the NOP to those potentially eligible property owners who were not previously notified in the original NOP distribution. The NOP was also redistributed to responsible and trustee agencies, other agencies required to receive the notice, and the State Office of Planning and Research. The NOP was recirculated for a 30-day comment period from May 1, 2015, to June 1, 2015. As a result of the NOP recirculation, one additional scoping meeting was held to provide agencies and owners of

the potentially eligible parcels that have been added to the study area, the opportunity to participate in the scoping process. The meeting was held on May 20, 2015, from 6:30 p.m. to 8:00 p.m. at the Chimbole Cultural Center located at 38350 Sierra Highway in Palmdale, California.

Table ES.3-1, *Scoping Meetings—Comment Issue Areas*, provides a summary of the nature of the comments received at the five public scoping meetings with regard to environmental issue areas.

**TABLE ES.3-1  
SCOPING MEETINGS—COMMENT ISSUE AREAS**

<b>Environmental Issue Area</b>	<b>Total Comments Received</b>	<b>Percentage of Total Comments</b>
Project Description	75	31%
Alternatives	17	7%
Aesthetics	6	2%
Air Quality	3	1%
Biological Resources	11	4%
Cultural Resources	3	1%
Greenhouse Gas Emissions	5	2%
Hydrology and Water Quality	11	4%
Land Use and Planning	12	5%
Noise	2	1%
Population and Housing	13	5%
Public Services	3	1%
Recreation	2	1%
Transportation and Traffic	3	1%
Utilities and Service Systems	61	25%
Nonspecific Comments	18	7%
<b>Total</b>	<b>245</b>	<b>100%</b>

As the table shows, the majority of the comments received related to the project description and utilities and service systems.

#### **ES.4 SUMMARY OF IMPACTS**

The Initial Study analysis undertaken in support of this EIR determined that four of the 17 environmental issue areas recommended for consideration in Appendix G of the State CEQA Guidelines would not be expected to experience significant impacts resulting from implementation of the proposed initiative: agriculture and forestry resources, geology and soils, hazards and hazardous materials, and mineral resources.<sup>3</sup>

<sup>3</sup> County of Los Angeles. September 2014. Single-Family Residential Hauled Water Initiative for New Development Initial Study. Prepared by: Sapphos Environmental, Inc., Pasadena, CA.

Therefore, the EIR evaluated 13 of the 17 environmental issue areas identified for consideration in Appendix G of the State CEQA Guidelines. The Initial Study was made available for public and agency review with the Notice of Preparation between September 17, 2014, and October 20, 2014, and was recirculated with the revised study area between May 1, 2015, and June 1, 2015.

The analysis undertaken in the EIR for the remaining 13 environmental issues area resulted in the determination that the proposed initiative would result in less than significant impact to two areas: Population and Housing, and Transportation and Traffic. The EIR determined that the proposed initiative has the potential to result in significant impacts related to 11 environmental resources (Table ES.4-1, *Summary of Significant Impacts and Proposed Mitigation Measures*). Significant impacts for one of these 11 environmental resources, Noise, are able to be reduced to below the level of significance. However, even with the consideration of mitigation measures, the potential remains for significant and unavoidable impacts to 10 environmental resources: Aesthetics, Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Public Services, Recreation, and Utilities and Service Systems (Table ES.4-1).

**TABLE ES.4-1  
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION MEASURES**

Impact	Mitigation Measure	Level of Significance after Mitigation
<b>Aesthetics</b>		
<b>IMPACT AES-1:</b> the proposed initiative would not result in significant impacts to aesthetics in regard to having a substantial adverse effect on a scenic vista.	Less than significant without mitigation	<b>Less than significant</b>
<b>IMPACT AES-2:</b> The proposed initiative would result in significant impacts to aesthetics related to substantial damage to scenic resources within a state scenic highway.	<b>MM-AES-1:</b> To mitigate potential impacts on aesthetics, including scenic resources within a State scenic highway, adverse changes to visual quality or character of an area, or creation of new sources of light and glare, property owners determined to be eligible to develop properties using hauled water as the primary source of potable water shall be required to complete and submit a <i>Site Plan Review Application</i> to the County of Los Angeles Department of Regional Planning. The <i>Site Plan Review Application</i> shall contain relevant information to characterize the project for consistency with County of Los Angeles General Plan Goals and Policies related to visual character and quality, including development that affects the viewshed of a state-designated scenic highway or a highway determined eligible for state designation as a scenic highway; consistency with applicable Community Standards Districts, including a site plan that describes existing oak trees, the proposed building materials, hardscape and landscape plans (including fences, setbacks, and walls); and design features that have been used to avoid or minimize impacts on State- or County-designated scenic highways or routes, to the extent feasible. The site plan shall note the location of any existing or proposed trails depicted in the <i>Regional Trail System</i> map, in the "Parks and Recreation Element" of the <i>County General Plan</i> , and provide evidence of avoidance of trail easement recording or alignment agreement with the Department of Parks and Recreation for existing or proposed trails that would be affected by the development of the proposed property. The site plan shall demonstrate the manner in which building materials or visual screening have been used to visually screen buildings and structures and reduce daytime glare. The Site Plan shall also demonstrate compliance with any additional site requirements related to applicable Community Standards District standards.	As part of the County of Los Angeles Department of Public Works, Building and Safety Division plan check and agency referral process and the Department of Regional Planning Site Plan Review Application, property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with applicable legal requirements and regulatory measures (see Appendix C, <i>Regulatory Measures</i> ).  Although conformance with regulatory measures and implementation of <b>MM-AES-1</b> would reduce and avoid impacts, impacts to scenic resources that are visible from State scenic highways would not be reduced to below the level of significance. Therefore, the direct, indirect, and cumulative impacts of the proposed initiative would remain <b>significant and unavoidable</b> .
<b>IMPACT AES-3:</b> The proposed initiative would result in significant impacts to aesthetics in relation to substantial degradation of the existing visual character or quality of the site and its surroundings.	<b>MM-AES-1</b>	As part of the County of Los Angeles Department of Public Works, Building and Safety Division plan check and agency referral process and the Department of Regional Planning Site Plan Review Application, property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with legal requirements and regulatory measures (please see Appendix C, <i>Regulatory Measures</i> ).  Although conformance with regulatory measures and implementation of <b>MM-AES-1</b> would reduce impacts, impacts resulting from the change in visual quality from currently undeveloped state to residential development would not be reduced to below the level of significance. Therefore, the direct, indirect, and cumulative impacts of the proposed initiative on aesthetics from the change in visual character would remain <b>significant and unavoidable</b> .

**TABLE ES.4-1  
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION MEASURES**

Impact	Mitigation Measure	Level of Significance after Mitigation
<p><b>IMPACT AES-4:</b> The proposed initiative would be expected to result in significant impacts to aesthetics in relation to the creation of a new source of substantial light or glare that would adversely affect daytime or nighttime views in the proposed initiative study area.</p>	<p><b>MM-AES-1</b></p>	<p>As part of the County of Los Angeles Department of Public Works, Building and Safety Division plan check and agency referral process and the Department of Regional Planning Site Plan Review Application, property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with legal requirements and regulatory measures (please see <b>Appendix C, Regulatory Measures</b>).</p> <p>Conformance with regulatory measures and implementation of <b>MM-AES-1</b>, which requires conformance with Community Standards District guidelines related to the reduction of daytime glare and protection of the night sky, would reduce and avoid impacts to aesthetics from the creation of new sources of light and glare to below the level of significance. Therefore, the direct, indirect, and cumulative impacts of the proposed initiative would be <b>less than significant</b>.</p>
<p><b>Air Quality</b></p> <p><b>IMPACT AIR-1:</b> The proposed initiative would result in significant impacts to air quality in relation to conflicting with or obstructing implementation of the applicable air quality plan, due to the increase in criteria pollutants resulting from the transport of water via diesel trucks that conflicts with goals, policies, guiding principles and strategies in the South Coast Air Quality Management Plan intended to strive towards conformation with National Ambient Air Quality Standards and the California Ambient Air Quality Standards.</p>	<p><b>MM-AIR-1:</b> To mitigate potential impacts on air quality from fugitive dust, and criteria pollutants during construction, property owners determined to be eligible to develop properties using hauled water as the primary source of potable water shall adhere to Department or Regional Planning Standard Conditions of Approval related to protection of air quality:</p> <ul style="list-style-type: none"> <li>• All</li> <li>• Implement measures required and recommended by the South Coast Air Quality Management District and the Antelope Valley Air Quality Management District at the time of construction. The feasibility of such measure to avoid or reduce impacts is characterized by five examples of such measure that were required or recommended at the time of preparation of this EIR: <ul style="list-style-type: none"> <li>○ Keep all construction equipment in proper tune in accordance with manufacturer's specifications.</li> <li>○ Use late-model heavy-duty diesel-powered equipment at the Project Site to the extent that it is readily available in the South Coast Air Basin (meaning that it does not have to be imported from another air basin and the procurement of the equipment would not cause a delay in construction activities of more than two weeks).</li> <li>○ Use low emission diesel fuel for all heavy-duty diesel-powered equipment operating and refueling at the project site to the extent that it is readily available and cost effective in the South Coast Air Basin (meaning that it does not have to be imported from another air basin and the procurement of the equipment would not cause a delay in construction activities of more than two weeks, that the cost of the equipment is not more than 20 percent greater than the cost of standard equipment).</li> <li>○ Limit truck and equipment idling time to five minutes or less.</li> <li>○ Rely on the electricity infrastructure surrounding the construction site rather than electrical generators powered by internal combustion engines to the extent feasible.</li> </ul> </li> </ul>	<p><b>MM-AIR-1</b> would reduce impacts to air quality related to conflicting with or obstructing implementation of the applicable air quality plans. Property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be required to comply with legal requirements and regulatory measures (please see <b>Appendix C, Regulatory Measures</b>). In addition, the County has identified Best Practices which will be provided to all applicants for a building permit to construct a single-family residence using hauled water as the primary source of potable water (please see <b>Appendix D, Best Practices</b>). Implementation of <b>MM-AIR-1</b>, regulatory measures, and voluntary implementation of Best Practices would not reduce direct, indirect, and cumulative impacts to below the level of significance; therefore, impacts would remain <b>significant and unavoidable</b>.</p>

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SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION MEASURES**

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	<ul style="list-style-type: none"> <li>• All construction activities shall implement fugitive dust control measures in accordance with SCAQMD and AVAQMD Rule 403. Implement measures required and recommended by SCAQMD and AVAQMD at the time of construction. The feasibility of such measure to avoid or reduce impacts, related to fugitive dust, is characterized by eight examples of such measure that were required or recommended at the time of preparation of this EIR:               <ul style="list-style-type: none"> <li>○ Water active grading/excavation sites and unpaved surfaces at least three times daily.</li> <li>○ Cover stockpiles with tarps, or apply non-toxic chemical binders.</li> <li>○ Sweep daily (with water sweepers) all paved parking areas and staging areas.</li> <li>○ Provide daily clean-up of mud and dirt carried on to paved streets from the site.</li> <li>○ Wash off the tires of trucks of all trucks and equipment leaving the site.</li> <li>○ Install wind breaks at the windward side of the construction site.</li> <li>○ Suspend excavation and grading activity when winds (instantaneous gusts) exceed 15 miles per hour over a 30-minute period or more.</li> </ul> </li> </ul> <p>An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or report complaints regarding excessive fugitive dust generation. All reasonable complaints shall be rectified within 24 hours of their receipt.</p>	
<p><b>IMPACT AIR-2:</b> The proposed initiative would result in significant impacts to air quality in relation to violation of any air quality standard or substantial contribution to an existing or projected air quality violation.</p>	<p><b>MM- AIR-1</b></p>	<p><b>MM-AIR-1</b> would reduce impacts to air quality related to violating any air quality standard or contributing substantially to an existing or projected air quality violation. Property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be required to comply with legal requirements and regulatory measures (please see Appendix C, <i>Regulatory Measures</i>). In addition, the County has identified Best Practices that may be employed to mitigate PM2.5 and PM10 emissions from fugitive dust (please see Appendix D, <i>Best Practices</i>). Implementation of <b>MM-AIR-1</b>, regulatory measures, and voluntary implementation of Best Practices would not reduce direct, indirect, and cumulative impacts to below the level of significance; therefore, impacts would remain <b>significant and unavoidable</b>.</p>
<p><b>IMPACT AIR-3:</b> The proposed initiative would result in significant impacts to air quality in relation to resulting in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).</p>	<p><b>MM- AIR-1</b></p>	<p><b>MM-AIR-1</b> would reduce impacts to air quality relating to a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). Property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be required to comply with legal requirements and regulatory measures (please see Appendix C, <i>Regulatory Measures</i>). In addition, the County has identified Best Practices that may be employed to mitigate PM2.5 and PM10 emissions from fugitive dust (please see Appendix D, <i>Best Practices</i>). Implementation of <b>MM-AIR-1</b>, regulatory measures, and voluntary implementation of Best Practices would not reduce direct, indirect, and cumulative impacts to below the level of significance; therefore, impacts would remain <b>significant and unavoidable</b>.</p>
<p><b>IMPACT AIR-4:</b> The analysis undertaken for this EIR determined that no significant impacts related to exposure of sensitive receptors to substantial pollutant concentrations would arise.</p>	<p>Less than significant without mitigation</p>	<p><b>Less than significant.</b></p>
<p><b>IMPACT AIR-5:</b> The proposed initiative would result in less than significant impacts to air quality related to creating objectionable odors affecting a substantial number of people.</p>	<p>Less than significant without mitigation</p>	<p><b>Less than significant.</b></p>

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Impact	Mitigation Measure	Level of Significance after Mitigation
<p><b>Biological Resources</b></p> <p><b>IMPACT BIO-1:</b> The proposed initiative would result in significant impacts to biological resources in relation to having a substantial adverse effect, either directly or through habitat modification, on up to 27 species listed as rare, threatened or endangered pursuant to the Federal or State Endangered Species Acts or the California Native Plant Protection Act, up to four species designated as fully protected pursuant to Sections 3511, 4700, 5050, and 5515 of the State Fish and Game Code that aren't otherwise protected pursuant to the State or Federal Endangered Species Acts, up to 12 locally important plant species protected under the California Desert Native Plant Act (Section 80071-80075 of the State Food and Agricultural Code), and up to two locally important furbearing mammal species protected under Section 4150 of the State Fish and Game Code.</p>	<p>No feasible mitigation measures</p>	<p>As part of the County of Los Angeles Department of Public Works, Building and Safety Division plan check and agency referral process and the Department of Regional Planning Site Plan Review Application, property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with legal requirements and regulatory measures (please see Appendix C, <i>Regulatory Measures</i>). Therefore, compliance with these statutes would be expected to reduce impacts to these species to below the level of significance.</p> <p>The County has identified Best Practices that may be employed to avoid and minimize the direct, indirect, and cumulative impacts on candidate, sensitive, and special status species not afforded protection under the statutes outlined above (please see Appendix D, <i>Best Practices</i>). However, development of a single-family residence is a by-right land use subject to a non-discretionary building permit, and the County may not compel property owners to implement the identified Best Practices. Therefore, direct, indirect, and cumulative impacts on candidate, sensitive, and special status species not afforded protection under federal and state statutes would be <b>significant and unavoidable</b>.</p>
<p><b>IMPACT BIO-2:</b> The proposed initiative would result in significant impacts to biological resources in relation to having a substantial adverse effect, either directly or through habitat modification, on up to 71 species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service. These agencies identify additional candidate, sensitive and special status species that are not provided the same level of statutory protection as listed or fully protected species.</p> <p>The proposed initiative would result in significant impacts to biological resources in relation to having a substantial adverse effect on riparian habitat under the jurisdiction of the CDFW, protected under Section 1600 of the State Fish and Game Code.</p> <p>The proposed initiative would result in significant impacts to biological resources in relation to having a substantial adverse effect on sensitive plant communities or riparian communities in upland conditions that do not fall within areas under the jurisdiction of the CDFW, under Section 1600 of the State Fish and Game Code.</p>	<p>No feasible mitigation measures</p>	<p>As part of the County of Los Angeles Department of Public Works Building and Safety Division plan check and agency referral process and the Department of Regional Planning Site Plan Review Application, property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with legal requirements and regulatory measures (please see Appendix C, <i>Regulatory Measures</i>). Therefore, compliance with applicable provisions of Section 1600 of the State Fish and Game Code would be expected to reduce impacts to riparian habitat under the jurisdiction of CDFW to below the level of significance.</p> <p>The County has identified Best Practices that may be employed to avoid, reduce, or compensate for the net loss of State-designated sensitive plant communities and riparian communities that do not fall within areas under the jurisdiction of the CDFW, under Section 1600 of the State Fish and Game Code (please see Appendix D, <i>Best Practices</i>). However, development of a single-family residence is a by-right land use subject to a non-discretionary building permit, and the County may not compel property owners to implement the identified Best Practices. Therefore, direct, indirect, and cumulative impacts on State-designated sensitive plant communities and riparian communities that do not fall within areas under the jurisdiction of the CDFW would be <b>significant and unavoidable</b>.</p>

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Impact	Mitigation Measure	Level of Significance after Mitigation
<p><b>IMPACT BIO-3:</b> The proposed initiative would result in significant impacts to biological resources in relation to having a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.</p>	<p>No feasible mitigation measures</p>	<p>As part of the County of Los Angeles Department of Public Works Building and Safety Division plan check and agency referral process and the Department of Regional Planning Site Plan Review Application, property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with legal requirements and regulatory measures (please see Appendix C, <i>Regulatory Measures</i>). Compliance with applicable provisions of Section 404 of the federal Clean Water Act would be expected to reduce impacts to federally protected wetlands to below the level of significance. Therefore, impacts would be <b>less than significant</b>.</p>
<p><b>IMPACT BIO-4:</b> The proposed initiative would result in significant impacts to biological resources in relation to impeding the use of native and migratory bird nursery sites.</p> <p>The proposed initiative would result in significant impacts to biological resources in relation to having substantial interference with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impeding the use of native wildlife non-avian nursery sites.</p>	<p>No feasible mitigation measures</p>	<p>As part of the County of Los Angeles Department of Public Works Building and Safety Division plan check and agency referral process and the Department of Regional Planning Site Plan Review Application, property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with legal requirements and regulatory measures (please see Appendix C, <i>Regulatory Measures</i>). Therefore, compliance with applicable provisions of the Migratory Bird Treaty Act and Sections 3503 and 3503.5 of the State Fish and Game Code would be expected to reduce impacts to nursery sites for native resident and migratory birds below the level of significance.</p> <p>The County has identified Best Practices that may be employed to avoid, reduce, or compensate for substantial interference with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or use of native wildlife nursery sites (please see Appendix D, <i>Best Practices</i>). However, development of a single-family residence is a by-right land use subject to a non-discretionary building permit, and the County may not compel property owners to implement the identified Best Practice. Therefore, direct, indirect, and cumulative impacts related to interference with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or use of native wildlife nursery sites would be <b>significant and unavoidable</b>.</p>
<p><b>IMPACT BIO-5:</b> The proposed initiative would result in significant impacts to biological resources in relation to conflicting with local policies protecting biological resources found in applicable General Plans and Areawide Plans.</p> <p>The proposed initiative would result in less than significant impacts to biological resources in relation to conflicting with any tree preservation policy or ordinance.</p>	<p><b>MM-AES-1</b></p>	<p>Direct, indirect, and cumulative impacts of the proposed initiative on oak trees protected by the Los Angeles County Oak Tree Ordinance would be expected to be reduced below the level of significance through the implementation of <b>MM-AES-1</b>.</p> <p>The County has identified Best Practices that may be used to demonstrate consistency with General Plan goals and policies related to biological resources not afforded protection by federal, state, and local statutes and regulations (please see Appendix D, <i>Best Practices</i>). However, development of a single-family residence is a by-right land use subject to a non-discretionary building permit, and the County may not compel property owners to implement the identified Best Practices. Therefore, direct, indirect, and cumulative impacts related to conflicts with General Plan goals and policies related to biological resources not afforded protection by federal, state, and local statutes and regulations would be <b>significant and unavoidable</b>.</p>
<p><b>IMPACT BIO-6:</b> The proposed initiative would result in no impacts to biological resources in relation to conflicting with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.</p>	<p>Less than significant without mitigation</p>	<p><b>Less than significant</b></p>

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Cultural Resources	Impact	Mitigation Measure	Level of Significance after Mitigation
	<p><b>IMPACT CUL-1:</b> The proposed initiative would have the potential to result in significant impacts to cultural resources by causing a substantial adverse change in the significance of a historical resource as defined in §15064.5 of the State CEQA Guidelines, where such resources are unknown and encountered during construction of a residential structure, facilitated through the proposed initiative.</p>	<p>No feasible mitigation measures</p>	<p>The County has identified Best Practices that may be employed to avoid and minimize the significant direct, indirect, and cumulative impacts to cultural resources caused by a substantial adverse change in the significance of a historical resource, as defined in Section 15064.5 of the State CEQA Guidelines, that was not known to be present and is encountered during construction of a residential structure (please see Appendix D, <i>Best Practices</i>). The Best Practices include a record search at SCCIC, NAHC consultation, archaeological or architectural site survey, and monitoring of ground disturbance in high-sensitivity areas.</p> <p>Where the property owner implements the Best Practices identified by the County, impacts to historical resources would be reduced to below the level of significance by stopping ground-disturbing activities in the area where historical resources are found until a qualified archaeologist can determine the importance of these resources. However, development of a single-family residence is a by-right land use subject to a non-discretionary building permit, and the County may not compel property owners to implement the identified Best Practices. Therefore, direct, indirect, and cumulative impacts to historical resources would be <b>significant and unavoidable</b>.</p>
	<p><b>IMPACT CUL-2:</b> The proposed initiative would have the potential to result in significant impacts to cultural resources in relation to causing a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5, where such resources are unknown and encountered during construction of a residential structure, facilitated through the proposed initiative.</p>	<p>No feasible mitigation measures</p>	<p>The County has identified Best Practices that may be employed to avoid and minimize the significant direct, indirect, and cumulative impacts to cultural resources caused by a substantial adverse change in the significance of an archaeological resource, as defined in Section 15064.5 of the State CEQA Guidelines, that was not known to be present and is encountered during construction of a residential structure (please see Appendix D, <i>Best Practices</i>). The Best Practices include a record search at SCCIC, NAHC consultation, archaeological or architectural site survey, and monitoring of ground disturbance in high-sensitivity areas.</p> <p>Where the property owner implements the Best Practices identified by the County, impacts to unique archeological resources would be reduced to below the level of significance by stopping ground-disturbing activities in the area where historical resources are found until a qualified archaeologist can determine the importance of these resources. However, development of a single-family residence is a by-right land use subject to a non-discretionary building permit, and the County may not compel property owners to implement the identified Best Practices. Therefore, direct, indirect, and cumulative impacts on archeological resources would be <b>significant and unavoidable</b>.</p>

**TABLE ES.4-1  
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION MEASURES**

Impact	Mitigation Measure	Level of Significance after Mitigation
<p><b>IMPACT CUL-3:</b> The proposed initiative would have the potential to result in significant impacts to cultural resources through the direct destruction of unique paleontological resources or sites or unique geological features, and the contribution of these potential losses at individual properties to cumulative destruction of paleontological resources in the hauled water study area, where such resources are unknown and encountered during construction of a residential structure, facilitated through the proposed initiative.</p>	<p>No feasible mitigation measures</p>	<p>The County has identified Best Practices that may be employed to avoid and minimize the significant direct, indirect, and cumulative impacts to cultural resources caused by the destruction of unique paleontological resources or sites or unique geological features, and the contribution of these potential losses at individual properties to cumulative destruction of unique paleontological resources and geological sites during construction of residential structures made possible by the proposed initiative (please see Appendix D, <i>Best Practices</i>). The Best Practices include a record search at SCCIC, NAHC consultation, archaeological or architectural site survey, and monitoring of ground disturbance in high-sensitivity areas.</p> <p>Where the property owner implements the Best Practices identified by the County, impacts to unique paleontological resources and geologic features would be reduced to below the level of significance by stopping ground-disturbing activities in the area where paleontological resources are found until a qualified paleontologist can recover and salvage the fossil remains. However, development of a single-family residence is a by-right land use subject to a non-discretionary building permit, and the County may not compel property owners to implement the identified Best Practices. Therefore, direct, indirect, and cumulative impacts on unique paleontological resources and geologic features would be <b>significant and unavoidable</b>.</p>
<p><b>IMPACT CUL-4:</b> The proposed initiative would have the potential to result in significant impacts to cultural resources in relation to disturbing any human remains, including those interred outside of formal cemeteries, in the unanticipated event that such resources are encountered during grading to construct a residential structure facilitated through the proposed initiative, where such resources are unknown and encountered during construction of a residential structure, facilitated through the proposed initiative.</p>	<p>No feasible mitigation measures</p>	<p>As part of the County of Los Angeles Department of Public Works, Building and Safety Division plan check and agency referral process and the Department of Regional Planning Site Plan Review Application, property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with legal requirements and regulatory measures (please see Appendix C, <i>Regulatory Measures</i>).</p> <p>Compliance with applicable provisions of the Native American Graves Protection and Repatriation Act of 1990; the Public Resources Code Section 5097.9 through 5097.991; California Native American Graves Protection and Repatriation Act of 2001; Health and Safety Code Sections 7050 and 7052; and Penal Code Section 622.5 would be expected to reduce impacts to below the level of significance. The Los Angeles County Coroner shall be notified within 24 hours of the discovery of human remains. Upon discovery of human remains, there shall be no further excavation or disturbance of the site or any of that area reasonably suspected to overlie adjacent human remains until the Los Angeles County Coroner has determined that no investigation of the cause of death is required and the descendants from the deceased Native Americans have made a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98. Therefore, direct, indirect, and cumulative impacts on human remains, including those interred outside of formal cemeteries, would be <b>less than significant</b>.</p>

**TABLE ES.4-1  
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION MEASURES**

Impact	Mitigation Measure	Level of Significance after Mitigation
<p><b>Greenhouse Gas Emissions</b></p> <p><b>IMPACT GHG-1:</b> The proposed initiative would result in significant impacts in relation to generating greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.</p>	<p><b>MM-GHG-1:</b> To mitigate potential impacts from the generation of GHG emissions for parcels determined to be eligible for development using hauled water as the primary source of potable water, applicants for building permits shall be required to conform to the California Green Building Standards Code, Chapter 4 Residential Mandatory Measures, in particular those that are consistent with strategies that have been identified in the County Climate Action Plan for use of hauled water as a primary source of potable water pursuant to the proposed initiative. The County shall notify applicants for building permits during plot plan review. Applicants shall conform specifically to the General Requirements specified in the County of Los Angeles Department of Public Works, Building and Safety Division Green Building Standards Code, including the following:</p> <ul style="list-style-type: none"> <li>a) Buildings shall comply with the 2008 Building Energy Efficiency Standards Title 24, Part 1, Article 1, and Part 6 of the California Code of Regulations.</li> <li>b) Plumbing fixtures and fixture fittings on the plans shall reduce the potable water use within the building by at least 20%.</li> <li>c) Annular spaces around pipes, electrical cables, conduits, or other openings in plates at exterior walls shall be protected against the passage of rodents by closing such openings with cement mortar, concrete masonry, or a similar method acceptable to the enforcing agency.</li> <li>d) Fireplaces shall be direct vent sealed combustion chamber type. Indicate on the plans the manufacturer name and model number.</li> <li>e) At the time of rough installation, during storage on the construction site, and until final startup of the heating and cooling and ventilating equipment, all duct and other related air distribution component openings shall be covered with tape, plastic, sheet metal, or other acceptable methods to reduce the amount of water, dust and debris which may collect in the system.</li> <li>f) Building materials with visible signs of water damage shall not be installed. Wall and floor framing shall not be enclosed when the framing members exceed 19% moisture content. Insulation products which are visibly wet or have high moisture content shall be replaced or allowed to dry prior to enclosure in wall or floor cavities.</li> <li>g) All mechanical exhaust fans in rooms with a bathtub or shower shall comply with the following: <ul style="list-style-type: none"> <li>a. Fans shall be ENERGY STAR compliant and be ducted to terminate outside the building.</li> <li>b. Fans must be controlled by a readily accessible humidistat unless functioning as a component of a whole house ventilation system. Humidity control shall be capable of adjustment between a relative humidity range between 50% and 80%.</li> </ul> </li> <li>h) Adhesives, sealants and caulks shall meet or exceed the standards outlined in Section 4.504.2.1 and comply with the VOC limits in Tables 4.504.1 and 4.504.2 as applicable in the Green Building Standards Code.</li> <li>i) Paints and coatings shall meet or exceed the standards outlined in Section 4.504.2.2 and comply with the VOC limits in Table 4.504.3 in the Green Building Standards Code.</li> <li>j) Aerosol paints and coatings shall meet or exceed the standards outlined in Section 4.504.2.3 in the Green Building Standards Code.</li> </ul>	<p>As part of the County of Los Angeles Department of Public Works, Building and Safety Division plan check and agency referral process and the Department of Regional Planning <i>Site Plan Review Application</i>, property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with legal requirements and regulatory measures (please see Appendix C, <i>Regulatory Measures</i>).</p> <p>In addition to <b>MM-GHG-1</b>, the County has identified Best Practices that may be employed to avoid and minimize the significant direct, indirect, and cumulative impacts to the environment from the generation of greenhouse gas emissions during construction and occupancy of residential structures made possible by the proposed initiative (please see Appendix D, <i>Best Practices</i>).</p> <p>Per capita GHG emissions would be greater than other single-family residences due to the use of diesel trucks to haul water to each single-family residence, constituting a significant and unavoidable impact. Implementation of <b>MM-GHG-1</b> and voluntary implementation of Best Practices would not reduce these impacts to below the level of significance; therefore, impacts would remain <b>significant and unavoidable</b>.</p>

**TABLE ES.4-1  
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION MEASURES**

Impact	Mitigation Measure	Level of Significance after Mitigation
	<ul style="list-style-type: none"> <li>k) All carpet installed in the building interior shall meet all the testing and product requirements of one of the following:               <ul style="list-style-type: none"> <li>a. Carpet and Rug Institute's Green Label Plus Program OR</li> <li>b. California Department of Public Health Standard Method for the Testing and Evaluation of Volatile Organic Chemical Emissions from Indoor Sources using Environmental Chambers, Version 1.1 (SPEC 01350) OR</li> <li>c. NSF/ANSI 140 at the Gold Level OR</li> <li>d. Scientific Certifications Systems Indoor Advantage Gold</li> </ul> </li> <li>l) All carpet cushion installed in the building interior shall meet the requirements of the Carpet and Rug Institute Green Label Program. Carpet adhesives shall not exceed a VOC limit of 50 g/L.</li> <li>m) A minimum of 50% of floor area receiving resilient flooring shall comply with one of the following:               <ul style="list-style-type: none"> <li>a. The VOC emission limits defined in the CHPS criteria and listed on its High Performance Database, OR</li> <li>b. CHPS criteria certified under the Greenguard Children &amp; Schools program, OR</li> <li>c. RFCI FloorScore program, OR</li> <li>d. California Department of Public Health 2010 Standard Method for the Testing and Evaluation of Volatile Organic Chemical Emissions from Indoor Sources Using Environmental Chambers, Version 1.1 (SPEC 01350)</li> </ul> </li> <li>n) Composite wood products (hardwood plywood, particle board, and MDF) installed on the interior or exterior of the building shall meet or exceed the standards outlined in Table 4.504.5 in the Green Building Standards Code. Verification of compliance with these sections must be provided at the time of inspection.</li> </ul>	
<p><b>IMPACT GHG-2:</b> The proposed initiative would result in significant impacts in relation to conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.</p>	<p><b>MM-GHG-1</b></p>	<p>As part of the County of Los Angeles Department of Public Works, Building and Safety Division plan check and agency referral process and the Department of Regional Planning Site Plan Review Application, property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with legal requirements and regulatory measures (please see Appendix C, <i>Regulatory Measures</i>).</p> <p>Implementation of <b>MM-GHG-1</b> and voluntary implementation of Best Practices would not reduce conflicts with the County of Los Angeles General Plan Goals and Policies related to reduction of GHG, the County of Los Angeles Climate Action Plan or the 2012 Regional Transportation Plan/Sustainable Communities Strategy to below the level of significance; therefore, impacts would remain <b>significant and unavoidable</b>.</p>

**TABLE ES.4-1  
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION MEASURES**

Impact	Mitigation Measure	Level of Significance after Mitigation
<p><b>Hydrology and Water Quality</b>  <b>IMPACT HYDRO-1:</b> The development of single-family residences in the hauled water study area would be expected to contribute to significant direct, indirect, and cumulative impacts on violations of water quality standards because the study area is characterized by having minimal or no stormwater drainage facilities and County's LID ordinance does not require a specific reduction in pollutant discharges.</p>	<p>No feasible mitigation measures</p>	<p>As part of the County of Los Angeles Department of Public Works, Building and Safety Division plan check and agency referral process and the Department of Regional Planning Site Plan Review Application, property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with legal requirements and regulatory measures (please see EIR Appendix C, <i>Regulatory Measures</i>). Although implementation of BMPs, required pursuant to the County's LID Ordinance, would reduce impacts, the implementation of two BMPs would not be expected to reduce impacts resulting from the increase in impervious surface and contribution of contaminants from the residential use of the property, to below the level of significance. Therefore, the direct, indirect and cumulative impacts of the proposed initiative on water quality from the potential violation of water quality standards established in the Water Basin Plan would be expected to be <b>significant and unavoidable</b>.</p>
<p><b>IMPACT HYDRO-2:</b> The proposed initiative would be expected to contribute to depletion of groundwater supplies such that there would be a net deficit in the volume of the three groundwater basins, Antelope Valley Basin, Santa Clara River Basin, and Acton Valley Basin, or lowering the local groundwater table in the hauled water study area, constituting a significant impact.</p>	<p>No feasible mitigation measures</p>	<p><b>Significant and unavoidable</b></p>
<p><b>IMPACT HYDRO-3:</b> The proposed initiative would not be expected to result in significant impacts associated with hydrology and water quality in relation to altering the existing natural drainage pattern within the seven subareas.</p>	<p>Less than significant without mitigation</p>	<p>As part of the County of Los Angeles Department of Public Works, Building and Safety Division plan check and agency referral process and the Department of Regional Planning Site Plan Review Application, property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with legal requirements and regulatory measures (please see EIR Appendix C, <i>Regulatory Measures</i>). Therefore, the direct, indirect and cumulative impacts of the proposed initiative on hydrology and water quality in relation to altering the existing natural drainage pattern within the seven subareas would be expected to be <b>less than significant</b>.</p>
<p><b>IMPACT HYDRO-4:</b> The proposed initiative would not be expected to result in significant impacts associated with hydrology and water quality in relation to altering the existing natural drainage pattern and increasing the amount of surface runoff within the seven subareas.</p>	<p>Less than significant without mitigation</p>	<p>As part of the County of Los Angeles Department of Public Works, Building and Safety Division plan check and agency referral process and the Department of Regional Planning Site Plan Review Application, property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with legal requirements and regulatory measures (please see EIR Appendix C, <i>Regulatory Measures</i>). Therefore, the direct, indirect and cumulative impacts of the proposed initiative on hydrology and water quality in relation to altering the existing natural drainage pattern and increasing the amount of surface runoff within the seven subareas would be expected to be <b>less than significant</b>.</p>

**TABLE ES.4-1  
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION MEASURES**

Impact	Mitigation Measure	Level of Significance after Mitigation
<p><b>IMPACT HYDRO-5:</b> The proposed initiative would not be expected to generate stormwater runoff in an area not currently served by an existing or planned stormwater drainage system or have the potential to create additional sources of polluted runoff</p>	<p>Less than significant without mitigation</p>	<p>Construction of single-family residences throughout the proposed initiative area would increase impervious surfaces in each of the seven subareas and result in increased stormwater runoff. Stormwater drainage systems may be needed to divert stormwater flow from the properties. Approved BMPs in the County LID Standards Manual are required to reduce the increased pollutant loads, but are not required to treat a specific size storm or to retain all of a development's stormwater runoff and, thus would not mimic-predevelopment hydrologic conditions. Conformance with regulatory measures would reduce and avoid impacts to violations of water quality standards; additionally, through the Building and Safety drainage review process, the developer of the single-family residence must demonstrate that there can be no substantial increase in storm water velocities or quantity downstream of the structure. Therefore, impacts would be <b>less than significant</b>.</p>
<p><b>IMPACT HYDRO-6:</b> The proposed initiative would be expected to substantially degrade water quality in the hauled water study area, constituting a significant impact</p>	<p>No feasible mitigation measures</p>	<p>There are no feasible mitigation measures to avoid or reduce impacts for this issue area. As part of the County of Los Angeles Department of Public Works, Building and Safety Division plan check and agency referral process and the Department of Regional Planning Site Plan Review Application, property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with legal requirements and regulatory measures (please see EIR Appendix C, <i>Regulatory Measures</i>). Therefore, the direct, indirect and cumulative impacts of the proposed initiative on hydrology and water quality in relation to the substantial degradation of water quality would be expected to remain <b>significant and unavoidable</b>.</p>
<p><b>IMPACT HYDRO-7:</b> The proposed initiative would not be expected to have the potential to result in significant impacts to hydrology and water quality in relation to placement of housing within a 100-year flood hazard area.</p>	<p>Less than significant without mitigation</p>	<p>As part of the County of Los Angeles Department of Public Works, Building and Safety Division plan check and agency referral process and the Department of Regional Planning Site Plan Review Application, property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with legal requirements and regulatory measures (please see EIR Appendix C, <i>Regulatory Measures</i>). The proposed initiative study area would place structures, including single-family residences and appurtenant structures such as roads, water towers, fences, garages, and outbuildings, within the 100-year Flood Hazard Area that would impede or redirect flood flows, constituting a significant impact. Several parts of the proposed initiative area are located in the boundaries of 100-year flood zones. However, through the Building and Safety drainage review process, the developer of the single-family residence must demonstrate that all buildings and structures have been designed to withstand a 100-year flood event. In addition, there can be no substantial increase in storm water velocities or quantity downstream of the structure. Therefore, the direct, indirect and cumulative impacts of the proposed initiative on hydrology and water quality in relation to placement of housing within a 100-year flood hazard area would be expected to be <b>less than significant</b>.</p>
<p><b>IMPACT HYDRO-8:</b> The proposed initiative would not be expected to result in the placement of structures, including single-family residences and appurtenant structures such as roads, water towers, fences, garages, and outbuildings, within the 100-year Flood Hazard Area that would impede or redirect flood flows.</p>	<p>Less than significant without mitigation</p>	<p>There are no feasible mitigation measures to avoid or reduce impacts for this issue area. As part of the County of Los Angeles Department of Public Works, Building and Safety Division plan check and agency referral process and the Department of Regional Planning Site Plan Review Application, property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with legal requirements and regulatory measures (please see EIR Appendix C, <i>Regulatory Measures</i>). Therefore, the direct, indirect and cumulative impacts of the proposed initiative on hydrology and water quality in relation to the placement of structures within a 100-year flood hazard area that would impede or redirect flood flows would be expected to be <b>less than significant</b>.</p>

**TABLE ES.4-1  
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION MEASURES**

<b>Impact</b>	<b>Mitigation Measure</b>	<b>Level of Significance after Mitigation</b>
<b>IMPACT HYDRO-9:</b> The proposed initiative has the potential to expose people or structures to a significant risk of loss, injury, or death as a result of the failure of a levee or dam, as some parcels are located downstream of such facilities, constituting a significant impact.	No feasible mitigation measures	<b>Significant and unavoidable</b>
<b>IMPACT HYDRO-10:</b> The proposed initiative would not be expected to expose people or property to inundation by seiche, tsunami or mudflow.	Less than significant without mitigation	<b>Less than significant</b>
<b>Land Use and Planning</b>		
<b>IMPACT LU-1:</b> The proposed initiative would result in significant impacts in relation to a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction of the project.	No feasible mitigation measures	<b>Significant and unavoidable</b>
<b>IMPACT LU-2:</b> The analysis undertaken for this EIR determined that no significant impacts related to a conflict with an applicable HCP or NCCP would arise from implementation of the proposed initiative. Therefore, no mitigation measures are required.	Less than significant without mitigation	<b>Less than significant</b>
<b>Noise</b>		
<b>IMPACT NOISE-1:</b> The proposed initiative would result in significant impacts in relation to the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies due to the use of heavy equipment during the construction of single-family homes and appurtenance structures, that would be expected to exceed ambient noise levels established the County Noise Ordinance.	No feasible mitigation measures	As part of the County of Los Angeles Department of Public Works, Building and Safety Division plan check and agency referral process and the Department of Regional Planning Site Plan Review Application, property owners who have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with legal requirements and regulatory measures (please see Appendix C, <i>Regulatory Measures</i> ). Compliance with the County of Los Angeles Noise Ordinance would be expected to reduce impacts to below the level of significance. Therefore, impacts would be <b>less than significant</b> .
<b>IMPACT NOISE-2:</b> The analysis undertaken for this EIR determined that no significant impacts related to exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels would arise from implementation of the proposed initiative. Therefore, no mitigation measures are required.	Less than significant without mitigation	<b>Less than significant</b>
<b>IMPACT NOISE-3:</b> The analysis undertaken for this EIR determined that no significant impacts related to a substantial permanent increase in ambient noise levels in the proposed initiative vicinity above levels existing without the proposed initiative would occur. Therefore, no mitigation measures are required.	Less than significant without mitigation	<b>Less than significant</b>

**TABLE ES.4-1  
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION MEASURES**

<b>Impact</b>	<b>Mitigation Measure</b>	<b>Level of Significance after Mitigation</b>
<b>IMPACT NOISE-4:</b> The proposed initiative would result in significant impacts in relation to a substantial temporary or periodic increase in ambient noise levels in the proposed initiative vicinity above levels existing without the proposed initiative.	No feasible mitigation measures	As part of the County of Los Angeles Department of Public Works, Building and Safety Division plan check and agency referral process and the Department of Regional Planning Site Plan Review Application, property owners who have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with legal requirements and regulatory measures (please see Appendix C, <i>Regulatory Measures</i> ). Compliance with the County of Los Angeles Noise Ordinance would be expected to reduce impacts to below the level of significance. Therefore, impacts would be <b>less than significant</b> .
<b>IMPACT NOISE-5:</b> The analysis undertaken for this EIR determined that, for an initiative parcel located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, the proposed initiative is not anticipated to expose people residing or working in the proposed initiative area to excessive noise levels. Therefore, no mitigation measures would be required.	Less than significant without mitigation	<b>Less than significant</b>
<b>IMPACT NOISE-6:</b> The analysis undertaken for this EIR determined that, for an initiative parcel located within the vicinity of a private airstrip, the proposed initiative is not anticipated to expose people residing or working in the proposed initiative area to excessive noise levels. Therefore, no mitigation measures would be required.	Less than significant without mitigation	<b>Less than significant</b>
<b>Population and Housing</b>		
<b>IMPACT POP-1:</b> The analysis undertaken for the EIR determined that no significant impacts related to Population and Housing would arise from implementation of the proposed initiative.	Less than significant without mitigation	<b>Less than significant</b>
<b>Public Services</b>		
<b>IMPACT PS-1:</b> The proposed initiative is expected to result in significant direct and indirect impacts associated with the provision of new or expanded fire protection services in order to maintain acceptable service ratios for fire protection.	No feasible mitigation measures	The County has been unable to identify feasible mitigation measures to avoid or reduce significant impacts related to new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service response times or other performance objectives for fire protection, due to the lack of authority to impose requirements on ministerial building permits. Measures to avoid or reduce impacts in regard to fire prevention are specified pursuant to County of Los Angeles Building and Safety Building Grading Guidelines, including the requirement that applicants located within Very Fire Hazard Severity Zones (commonly referred to as "Fire Zone 4") must obtain a Fire Department Permit prior to issuance of the grading permit. However, impacts would remain <b>significant and unavoidable</b> .
<b>IMPACT PS-2:</b> The proposed initiative is expected to result in significant impacts associated with the provision of new or expanded police protection services in order to maintain acceptable service ratios for police protection.	No feasible mitigation measures	<b>Significant and unavoidable</b>
<b>IMPACT PS-3:</b> The proposed initiative would be expected to result in significant impacts in regard to the potential for new or expanded schools in order to maintain acceptable service ratios.	No feasible mitigation measures	<b>Significant and unavoidable</b>

**TABLE ES.4-1  
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION MEASURES**

<b>Impact</b>	<b>Mitigation Measure</b>	<b>Level of Significance after Mitigation</b>
<b>IMPACT PS-4:</b> The proposed initiative is expected to result in significant impacts associated with the provision of new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios for parks.	<b>MM-REC-1</b>	Implementation of <b>MM-REC-1</b> would not reduce significant impacts related to the provision of new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios for parks to below the level of significance. Therefore, impacts would remain <b>significant and unavoidable</b> .
<b>IMPACT PS-5:</b> The proposed initiative would be expected to result in significant impacts in regard to the potential for new or expanded libraries or hospitals in order to maintain acceptable service ratios	No feasible mitigation measures	<b>Significant and unavoidable</b>
<b>Recreation</b>		
<b>IMPACT REC-1:</b> The proposed initiative is expected to result in significant impacts to recreation in relation to increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, due to an existing deficiency in local parkland that would be exacerbated by the proposed initiative.	<b>MM-REC-1:</b> To mitigate potential impacts to recreational trails, the County Department of Regional Planning shall notify the County of Los Angeles Department of Parks and Recreation's (DPR) Trail Planning Section when a proposed single-family development will impact a County trail alignment during the plot plan review process, prior to issuance of building permits. In coordination with DPR's Trail Planning Section, the review process shall include review of proposed development's assessor map for existing County trail easements and/or checking GIS data to identify if adopted-proposed County trail alignments are planned to traverse the proposed development. Upon notification from DPW Building and Safety Division, DPR's Trail Planning Section will analyze potential trail impacts from the development proposal reroute or realign the trail to maintain the integrity of the County's Trails Master Plan within the General Plan.	Implementation of <b>MM-REC-1</b> would reduce significant impacts related to increased use of existing neighborhood parks or other recreational facilities. However, due to the lack of authority to impose requirements on ministerial building permits, impacts would not be required to be reduced to below the level of significance, as they are for residential subdivisions pursuant to the Quimby Act. Therefore, impacts would remain <b>significant and unavoidable</b> .
<b>IMPACT REC-2:</b> The proposed initiative is expected to result in indirect significant impacts to recreation in regard to requiring the construction or expansion of recreational facilities which might have an adverse physical effect on the environment in order to meet County standards of service for local parkland in areas that are currently deficient for local parkland, with no generation of Quimby fees to support the development of new parks.	No feasible mitigation measures	<b>Significant and unavoidable</b>
<b>Transportation/Traffic</b>		
<b>IMPACT TRA-1:</b> The analysis undertaken for this EIR determined that no significant impacts related to roadways and circulation systems.	Less than significant without mitigation	<b>Less than significant</b>
<b>IMPACT TRA-2:</b> The analysis undertaken for this EIR determined that no significant impacts related to hazardous roadway design would arise from implementation of the proposed initiative.	Less than significant without mitigation	<b>Less than significant</b>
<b>IMPACT TRA-3:</b> The analysis undertaken for this EIR determined that no significant impacts related to emergency access would arise from implementation of the proposed initiative.	Less than significant without mitigation	<b>Less than significant</b>
<b>IMPACT TRA-4:</b> The analysis undertaken for this EIR determined that no significant impacts related to air traffic would arise from implementation of the proposed initiative.	Less than significant without mitigation	<b>No impact</b>

**TABLE ES.4-1  
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION MEASURES**

Impact	Mitigation Measure	Level of Significance after Mitigation
<b>IMPACT TRA-5:</b> The analysis undertaken for this EIR determined that no significant impacts related to alternative transportation would arise from implementation of the proposed initiative.	Less than significant without mitigation	<b>No impact</b>
<b>Utilities and Service Systems</b>		
<b>IMPACT USS-1:</b> The proposed initiative has the potential to result in significant impacts associated with utilities and service systems in relation to exceeding wastewater treatment requirements established by the State Water Resources Control Board OWTS Policy due to the potential for the operation of up to 3,680 OWTS over the 20-year planning which could result in excessive density of OWTS.	<b>MM-USS-1:</b> To mitigate potential impacts to existing potable water sources, including groundwater resources, in the proposed initiative study area from development of single-family homes where an established water purveyor or groundwater well cannot feasibly serve as the primary source of potable water, the County would provide notification during the plan check review process to property owners seeking permits for a single-family residence where hauled water would be used as the primary source of potable water, of the need to obtain a "will-serve" letter from an established water purveyor. To obtain a will-serve letter, a property owner would provide a tentative map, improvement plans prepared in accordance with the provisions of the County's Building Permit Application process, and any fee for plan review and forms that may be applicable for review.	The proposed initiative has the potential to result in significant impacts associated with utilities and service systems in relation to exceeding wastewater treatment requirements established by the State Water Resources Control Board OWTS Policy. <b>MM-USS-1</b> would reduce some of the impacts from OWTS. However, there is potential for the operation of up to 3,680 OWTS over the 20-year planning horizon to compromise groundwater and public health, or result in excessive density of OWTS. Impacts would remain <b>significant and unavoidable</b> .
<b>IMPACT USS-2:</b> The proposed initiative would result in less than significant impacts in relation to the construction of new water or wastewater treatment facilities or expansion of facilities, based on up to 12,880 additional people total from the single-family residential development and an estimated 30,368 gallons per year (gallons per year) (approximately 0.00008 million gallons per day) of additional wastewater could potentially enter the existing wastewater treatment facilities.	Less than significant without mitigation	<b>Less than significant</b>
<b>IMPACT USS-3:</b> The construction of new storm water drainage facilities or expansion of existing facilities to accommodate up to 3,680 new single-family homes in the proposed initiative study, due to the anticipated increase impervious surface by approximately 845 acres, constitutes a significant impact.	No feasible mitigation measures	As part of the County of Los Angeles Department of Public Works, Building and Safety Division plan check and agency referral process and the Department of Regional Planning Site Plan Review Application, property owners that have been determined to be eligible to develop properties using hauled water as the primary source of potable water would be notified of the requirement to comply with legal requirements and regulatory measures (please see EIR Appendix C, <i>Regulatory Measures</i> ).  Although implementation of BMPs, required pursuant to the County's LID Ordinance, would reduce impacts, the implementation of two BMPs would not be expected to reduce impacts resulting from the increase in impervious surface from the residential use of the property and other related projects in the region to below the level of significance. Therefore, the direct, indirect and cumulative impacts of the proposed initiative would likely contribute to the need for new stormwater drainage facilities or to expand existing facilities, and impacts would remain <b>significant and unavoidable</b> .
<b>IMPACT USS-4:</b> The proposed initiative would result in potentially significant impacts to utilities and service systems in relation to having sufficient water supplies available to serve the proposed initiative from existing entitlements and resources due to the potential of insufficient water supply to cover multiple dry year scenarios comparable to the scenario experienced in California between 2011 and 2015.	No feasible mitigation measures	<b>Significant and unavoidable</b>

**TABLE ES.4-1  
SUMMARY OF SIGNIFICANT IMPACTS AND PROPOSED MITIGATION MEASURES**

Impact	Mitigation Measure	Level of Significance after Mitigation
<p><b>IMPACT USS-5:</b> The proposed initiative would result in less than significant impacts in relation to resulting in a determination by the wastewater treatment provider that serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments, because the additional 153,639 gallons per year of wastewater that could potentially enter the existing water or wastewater treatment facilities would not be enough to overload the current capacity levels of the wastewater treatment facilities.</p>	<p>Less than significant without mitigation</p>	<p>Less than significant</p>
<p><b>IMPACT USS-6:</b> The proposed initiative would result in potentially significant impacts in relation to being served by a landfill with sufficient permitted capacity to accommodate the proposed initiative's solid waste disposal needs due to the potential to generate an additional 222,272 tons per year of solid waste, exceeding the current permitted landfill capacities.</p>	<p>No feasible mitigation measures</p>	<p>Significant and unavoidable</p>
<p><b>IMPACT USS-7:</b> The analysis undertaken for this EIR determined that the proposed initiative would not result in significant impacts relating to compliance with federal, State, and local statutes and regulations related to solid waste.</p>	<p>Less than significant without mitigation</p>	<p>Less than significant</p>
<p><b>Energy</b></p>		
<p><b>IMPACT EN-1:</b> The proposed initiative would result in significant impacts to energy conservation, because the direct effects of over 100 million gallons of fuel consumption to support hauled water and 228 Btu of energy from the residential structures, when combined with an additional nearly 50,000 residential units from related projects would contribute to significant direct, indirect and cumulative impacts.</p>	<p>No feasible mitigation measures</p>	<p>Significant and unavoidable</p>

The environmental analysis indicates that the proposed initiative would be growth-inducing in areas of the 5th Supervisorial District of Los Angeles County, where development is constrained due to being located outside a public or private water district and the inability to develop groundwater wells capable of meeting the County's criteria for potable water. The proposed initiative would facilitate development of single-family homes in locations that are inconsistent with goals and policies, related to orderly growth, that are articulated in the County of Los Angeles General Plan 2035 and the 2015 Antelope Valley Area Plan – Town & Country and 2012 Santa Clarita Valley Area Plan. The majority of the parcels are not adequately served by public services. In addition, all of the parcels that would be eligible for development through the proposed initiative are located outside the areas designated to meet the Regional Housing Needs Assessment, as specified in the Housing Element of the General Plan. The proposed initiative would also result in the irretrievable commitment of potable water and energy resources. The 2010 Urban Water Management Plans (UWMP) of surrounding agencies confirmed that there will be sufficient water supply for the build-out by 2035 of the proposed initiative parcels for the average weather year scenario at the average number of building permit data rate issued by Los Angeles County. However, in the single-dry and multiple-dry year scenarios, there will not be sufficient water supply for the existing customers and those that would be added due to the proposed initiative. In a single-dry year the proposed initiative is expected to result in a deficit in 2035 for all cases of development. Without the proposed initiative, the area is estimated to have a deficit of 45,198 acre-feet by 2035. The inclusion of the proposed initiative would result in a deficit of 47,953 acre-feet.

## **ES.5 PROJECT ALTERNATIVES**

As a result of the environmental analysis that resulted in a determination that the proposed initiative has the potential to result in significant and unavoidable impacts to 11 environmental resources, growth-inducing impacts, and irreversible and irretrievable commitment of resources, alternatives have been considered in this EIR. The evaluation of alternatives includes the No-Project alternative, required by CEQA, and action alternatives capable of achieving most of the basic objectives of the proposed initiative. The no-project and action alternatives were evaluated for their potential to avoid or reduce significant effects of the proposed initiative. Alternatives recommended by the scoping process were evaluated as related to the initiative objectives and their ability to reduce significant impacts as described in Section 4.0 of this EIR. Six project alternatives, including the no project alternative have been carried forward for detailed analysis in this EIR as required under CEQA:

- Alternative 1: Hauled Water Initiative for Parcels That Are 0.5 Net Acres or Greater in Size
- Alternative 2: Hauled Water Initiative for Parcels That Are 2.5 Net Acres or Greater in Size
- Alternative 3: Hauled Water Initiative for Parcels That Are Located within a 12-Minute Response Time of a Fire Department Emergency Response Unit
- Alternative 4: Hauled Water for Parcels Located within 200 Feet of an Existing Road
- Alternative 5: Hauled Water Initiative for Parcels That Are 2.5 net Acres or Greater in Size, Located within 200 Feet of an Existing Road, Located within 12-Minute Response Time of a Fire Department Emergency Response Unit
- Alternative 6: No Project (No Initiative) Alternative

Alternative No. 5 was determined to be the environmentally superior alternative. These alternatives are described and analyzed in Section 4.0, *Alternatives to the Proposed Project*, of this EIR.

Alternatives 1 through 5 progressively increase the thresholds for eligibility for use of hauled water as the primary source of potable water, thus restricting the parcels that could be considered eligible to areas that would minimize impacts on aesthetics, biological resources, and other land use conflicts. As a result, Alternative 5 would result in the lowest number of eligible parcels, would minimize the severity of the significant and unavoidable impacts of the proposed initiative and would constitute the Environmentally Superior Alternative among the action alternatives.

Some alternatives identified during the scoping process were beyond the scope of the proposed initiative and were not carried forward for detailed evaluation in the EIR.

Table ES.5-1, *Summary of Impacts for the Proposed Alternatives*, provides a simplified visual comparison of the environmental impacts of each of alternatives compared to the Proposed Initiative based on the number of significant and unavoidable and less than significant impacts. The rows under Totals at the bottom of the table provide a numeric summary for each of the fourteen environmental issue areas. As would be expected, Alternative No. 6, the No Project Alternative would result in the least amount of impact. Of the action alternatives, Alternative No. 5, *Parcels That Are 2.5 Net Acres or Greater in Size, Located within 200 Feet of an Existing Road, Located within a 12-Minute Response Time of a Fire Department Emergency Response Unit*, would have the least severe impacts of the action alternatives (Table ES.5-1).

**TABLE ES.5-1  
SUMMARY OF IMPACTS FOR THE PROPOSED ALTERNATIVES**

<b>Impacts (from Table ES.4-1)</b>	<b>Proposed Initiative</b>	<b>Alt. 1</b>	<b>Alt. 2</b>	<b>Alt. 3</b>	<b>Alt. 4</b>	<b>Alt. 5</b>	<b>Alt. 6</b>
Total S/U	33	33	33	31	31	30	0
Total LTS	27	27	27	29	29	30	60 (No Impact)
Total	60	60	60	60	60	60	60
% of S/U	55%	55%	55%	51.67%	51.67%	50%	0%
% of LTS	45%	45%	45%	48.33%	48.33%	50%	100%

**NOTE:** Evaluation is based on all questions related to each environmental issue area (number of questions for which a significant and unavoidable impact determination was made)

LTS = Less than Significant

S/U = Significant and Unavoidable Impacts

## **ES.6 AREAS OF KNOWN CONTROVERSY**

The Executive Summary is required to include areas of controversy known to the agency including issues raised by agencies and the public. During the scoping process and extended public outreach, a wide range of concerns were expressed by regulatory oversight agencies, special interest groups, property owners, and the public in relation to the proposed initiative. The comments ranged from opposition to the proposed initiative by regulatory oversight and non-governmental organizations, to requests for the proposed initiative to change the building permit process or to apply to properties that are located within public or private water districts, but for which service to the subject parcel was not available at the time of the publication of the Notice of Preparation. All of the comments received during the scoping period were reviewed. Where comments were applicable to the characterization of environmental baseline conditions, impact analysis, mitigation measures, or alternatives, the comments have been addressed in the EIR. In

addition, there are 12 areas of controversy that were expressed during the scoping process for the EIR for the proposed initiative: process, fairness, analysis assumptions, eligibility requirements, increased growth, sprawl, and lack of water resources, County Health Department standards, economic effects, health, property rights, and Significant Ecological Areas (SEAs) (Table ES.6-1, *Summary of Areas of Controversy*).

**TABLE ES.6-1  
SUMMARY OF AREAS OF CONTROVERSY**

<b>Category</b>	<b>General Comment</b>
<b>Process</b>	The length of time for the process of developing the initiative and the environmental review has taken too long.
	13 years is too long a time period to address this issue.
	The public does not have an easy way to determine if their parcel is affected by the initiative.
	The State's policy direction conflicts with the County's policy direction with regard to the use of hauled water.
	There has been a lack of notification as to whether or not a property is within an area that has access to water resources, making it questionable as to whether a parcel can be developed.
<b>Fairness</b>	There is an appearance of a lack of fairness for neighbors who currently use well water versus construction of new homes that are allowed to use hauled water.
	Water resources may be exhausted for existing residents in order to support new development using hauled water.
	Limited resources may be depleted for cash gains by people/agency/businesses who are not connected to the area
	The use of hauled water may result in dropping local water tables.
<b>Analysis Assumptions</b>	The number of parcels used for the analysis is too high.
	The water district boundaries used for the analysis are not accurate.
	Of the anticipated 184 building permits per year, it is not known how many of those permit applicants will actually require the use of hauled water. The assumption is too high.
<b>Eligibility Requirements</b>	Will parcels not included in the analysis be excluded from the potential use of hauled water through the initiative?
	The initiative does not address parcels that can be absolutely determined to have no capacity to provide groundwater, as determined by sonar or seismic testing rather than well drilling. Request that the ordinance also address how the groundwater is determined to exist.
<b>Increased Growth, Sprawl, and Lack of Water Resources</b>	More development will occur in rural areas as a result of the initiative causing population growth and sprawl.
	The development process has a haphazard nature. Development should be more organized and planned.
	The initiative may not capture the impacts caused by parcels that are able to drill a productive well.
	Where will water haulers obtain their water?
	How will the initiative affect water supplies during the drought?
	How will the initiative affect limited fire suppression water supplies?
	Water wasting landscaping such as green lawns are currently permitted.

**TABLE ES.6-1  
SUMMARY OF AREAS OF CONTROVERSY**

Category	General Comment
	<p>Agricultural uses in the area use tremendous amounts of water to grow crops that are unsustainable in an arid area.</p> <p>The per capita water use standards are too high. Due to the cost and difficulty of using hauled water, hauled water users would conserve more than water district water users.</p>
<b>County Health Department Standards</b>	<p>The County Health Department's well production standards are unreasonable. Specifically, the current requirement standard of 180 gallons per hour or 3 gallons per minute should be lowered. This would allow more people to use well water rather than rely on hauled water. The current standard is wasteful of water resources.</p> <p>It is onerous to request that a well be drilled to determine if water is present. Why couldn't a geological and hydrological study by a qualified hydro geologist or other sources of information be used to qualify the parcel as dry?</p> <p>How will EPA water quality standards be met?</p> <p>What will happen if an existing home's well runs dry?</p> <p>Replacement construction should be addressed as many current properties do not meet current County Health Department standards.</p> <p>There needs to be some flexibility in well standards to accommodate alternative compliance strategies such as larger tank capacity.</p>
<b>Economic Effects</b>	<p>It is cost prohibitive to drill a well only to find out it is dry. A well can cost between \$10,000 and \$12,000 to drill.</p> <p>If the hauled water initiative is not adopted property values will decline.</p> <p>Many property owners are unable to develop as a result of the lack of potable water.</p> <p>What will happen to property owners that are currently within water districts that do not have access to well water and the water district will not extend water lines to their outer boundaries?</p> <p>Some property owners are within the boundary of a water district but the water district has no plans to provide water service. How can these property owners develop?</p> <p>Land owners should have the option to only use hauled water as an alternative to the cost of drilling a well.</p> <p>How would the initiative affect property taxes?</p> <p>The size of houses will increase proportionally to the additional costs of providing water.</p> <p>The initiative would add to the costs of home construction and create a burden to lower income people.</p> <p>The use of hauled water could drive up water costs regionally.</p> <p>Restrictions on the ability to develop will reduce tax revenue.</p>
<b>Health</b>	<p>How will the quality and safety of hauled water be ensured?</p> <p>The County does not have the staffing resources to test the water quality of current wells in the County.</p> <p>How will the safety and quality of water haulers and vendors be ensured?</p>

**TABLE ES.6-1  
SUMMARY OF AREAS OF CONTROVERSY**

Category	General Comment
<b>Property Rights</b>	An issue of property rights will be raised if property owners are not allowed to develop as a result of a lack of potable water.
<b>Significant Ecological Areas</b>	Property values will decrease in SEAs.
	The mitigation requirements for juniper removal in SEAs are too high.

**ES.7 ISSUES TO BE RESOLVED**

The primary issue to be resolved by the Board of Supervisors in their deliberations is the decision among alternatives, including the proposed initiative, the no-project (or no initiative) alternative, or one of the five action alternatives. Each of the alternatives assesses the feasibility of avoiding or reducing the severity of the significant and unavoidable impacts of the proposed initiative. Two alternatives, Alternative 1 and Alternative 2, consider the effects of limiting the number of eligible parcels by placing restriction on the minimum parcel size eligible for the consideration of the use of hauled water. By limiting the lot size, these alternatives limit the number of eligible parcels and the geographic area affected by habitat fragmentation. However, because Alternatives 1 and 2 address the smallest parcels, they have relatively minor impact on the total area that would be potentially eligible for consideration of use hauled water as a source of potable water.

Alternative 3 considers a strategy that would not include parcels that are located farther than a 12-minute fire emergency response time from a fire station, pursuant to the Fire Department’s goals of responding to calls in urban areas within five minutes, in suburban areas within eight minutes, and in rural areas within 12 minutes, as eligible parcels for the initiative.<sup>4</sup> Any reference in this document to a 12-minute radius response time for police and fire personnel is used only as an index of distance from service facilities, and is based on a planning tool from the Safety Element of the Santa Clarita Valley Area Plan. It is not a service standard and does not reflect the dispatch and patrol practices of law enforcement. This alternative was developed to avoid or reduce impacts related to inconsistency with County of Los Angeles General Plan policies.

Alternative 4 considers a strategy that encourages development within proximity to existing roads and reducing fragmentation of habitat. There is an overlap in the parcels that would be eligible in Alternatives 2 and 4. If the eligibility criteria for Alternatives 2 and 4 are combined, the number of parcels that meet the criteria of being located within 200 feet of a road and are greater than or equal to 2.5 acres in size is 16,210. The land area in acres of these parcels is 225,392. Therefore, the eligible parcel reduction is 7,753 from Alternative 4 (23,963). The reduction percentage is 32 percent. The decrease in land area is 12,908 acres.

If the proposed initiative or action alternative is selected, the Board of Supervisors would need to further consider the implementation of proposed mitigation measures although these measures would not be required during the permit process for single-family residences that are located within a private or public water district, or that are able to develop a groundwater well as a reliable source of potable water.

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<sup>4</sup> County of Los Angeles Department of Regional Planning. Adopted 27 November 2012. Santa Clarita Valley Area Plan. Chapter 5: Safety. Available online at: <http://planning.lacounty.gov/ovov>